Title V Renewable Operating Permit – Renewal and Amendment Application and Technical Support Document

Prepared For:

FCA US LLC

JEFFERSON NORTH ASSEMBLY PLANT & DETROIT ASSEMBLY COMPLEX MACK

Prepared by:

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1.0 PROJECT BACKGROUND

FCA US LLC ("FCA") Jefferson North Assembly Plant ("JNAP") is located at 2101 Conner Avenue, Detroit, Wayne County, Michigan. The facility consists of an automobile and light duty truck assembly operation which operates pursuant to the conditions of Renewable Operating Permit ("ROP") No. MI-ROP-N2155-2017 issued on June 9, 2017. Activities at JNAP consist of a body shop, paint shop, and general assembly department to produce automobiles for FCA.

Pursuant to State of Michigan Rule 336.1210(7), a stationary source that renews its Title V permit must submit an administratively complete application not more than 18 months, but not less than 6 months, before the expiration date of the current ROP. JNAP's current ROP expires on June 9, 2022. Therefore, an administratively complete ROP application must be submitted to the Michigan Department of Environment, Great Lakes and Energy-Air Quality Division ("EGLE-AQD") no later than December 9, 2021. This application is responsive to that requirement.

FCA also owns and operates the Detroit Assembly Complex Mack plant ("Mack") in Detroit, Wayne County, Michigan. This site was the former Mack Avenue Engine Plant, which was issued ROP MI-ROP-M4085-2015a at street address 11570 Warren Avenue East, Detroit. The Mack facility presently operates an automotive assembly line pursuant to PTI No. 14-19A, issued on October 30, 2020. The facility is located at 4000 Saint Jean Street and is considered part of the same stationary source and maintains the same State Registration Number (N2155) as JNAP. Therefore, FCA seeks to roll PTI 14-19A issued for Mack into the ROP issued under N2155 as an administrative permit amendment (in accordance with R336.1216(1)(a)(v)) and part of this permitting activity.

Under separate cover, FCA will be submitting a request to void the former Mack Avenue Engine Plant ROP (MI-ROP-M4085-2015a) concurrent with issuance of the renewed ROP for the complex. As indicated in the associated ROP forms and ROP redline document, FCA is incorporating natural gas combustion equipment (i.e., air handling units) and Fire Pump #3 that were permitted in the original ROP (MI-ROP-M4085-2015a) into the new ROP, in Section 2.

The attached application form for the JNAP section notes, in Part F, that JNAP was issued PTI 33-20 on May 12, 2021. Construction activities specific to that PTI have not yet commenced. Therefore, FCA is not proposing to incorporate PIT 33-20 into the facility's ROP at this time.

2.0 RENEWABLE OPERATING PERMIT – RENEWAL/AMENDMENT APPLICATION

This ROP renewal and administrative amendment application was created using the EGLE-AQD's Renewable Operating Permit Renewal Application Form. The application was designed to renew the current JNAP ROP under a newly created Section 1 and incorporate Mack's PTI 14-19A into the ROP as Section 2. The discussions below provide details regarding the intent of the application in creating a streamlined ROP for the facility while incorporating the necessary application elements.

2.1 Insignificant and Exempt Emission Units

A complete Title V ROP application must identify significant air emission units/groups at a facility that are subject to regulatory requirements, including a classification of the specific applicable requirement (i.e., permit terms, consent orders, consent judgments, state or federal rule) as it applies to the emission source. Insignificant emission units may also need to be included in a complete application, depending upon the activity.

Insignificant emission units exempt from inclusion in the application are defined in MI Rules 336.1212(2), 212(3) or 212(4). Emission units defined in Rule 212(2) do not need to be included in the ROP application. Emission units defined in Rule 212(3) need not be included in a complete Title V ROP application unless the process or process equipment is subject to applicable requirements that include a process-specific emission limitation or standard. Emission units defined in Rule 212(4) are exempt from the requirement to obtain a PTI, however the emission units still need to be included in an administratively complete application. Part D of the ROP Renewal Application form is designed to identify emission units that are considered exempt but must be identified within the ROP Application pursuant to Rule 212(4).

JNAP:

The East Fire Pump, EU-ENG-EFP, was replaced in 2020 with a new diesel engine manufactured in 2019 (PTI exempt pursuant to Rule 285(2)(g)). The original engine was manufactured in 1991 and was considered an "existing" engine. The replacement engine is considered a "new" engine under the RICE MACT/NSPS, and the redline ROP includes the proposed content for the new fire pump consistent with the applicable NSPS requirements.

Mack:
There are no such emission units at the Mack facility at this time.

2.2 Proposed Changes to Existing Permit Terms

FCA has included in this application a redline ROP and a redline PTI that reflect updates or changes requested as part of the permit's renewal/amendment. Specifically, FCA has updated the emission unit list in Flexible Grouping FG-Facility of the ROP and has proposed the deletion of conditions related to the Mack PTI notification obligations that have already been satisfied.

The FG-Facility description and Flexible Group Summary Table within the ROP have been updated to more accurately reflect and include emission units associated with the assembly and painting of automobiles. Emission units that are not involved with vehicle assembly or coating operations, such as maintenance painting, (i.e., painting of buildings, floors, structures, etc.) and emergency engines, have been proposed for deletion in the redline. This proposed update is consistent with other FCA permits, including the JNAP and Mack PTIs. The ROP markup/redline also proposes to move the CAM related obligations from the Appendix to FG-Controls, consistent with other recently issued automotive ROPs.

The Mack PTI contains certain conditions for which a one-time notification or requirement is/was required. The specific conditions that have been satisfied and are no longer applicable have been proposed for deletion so as to not be incorporated into the ROP. Suggested clarifications have also been included relative to specific zones of EUTOPCOAT, FGCONTROLS, and FGAUTOASSEMBLY.

2.3 Maximum Achievable Control Technology (MACT) Standards

Pursuant to 40 CFR 63, sources that are considered either major or areas sources of hazardous air pollutants (HAPs) may be subject to National Emission Standards for Hazardous Air Pollutants (NESHAP), commonly referred to as MACT (Maximum Achievable Control Technology) standards.

JNAP is considered a major source of HAPs because actual emissions exceed the major source thresholds. The current ROP incorporates provisions specific to 40 CFR Subpart IIII (Surface Coating of Automobile and Light Duty Trucks, "Auto MACT"), 40 CFR 63 EEEE (organic liquid distribution, "OLD MACT"), 40 CFR 63 Subpart ZZZZ, (NESHAP for Reciprocating Internal Combustion Engines, "RICE MACT"), and 40 CFR 63 DDDDD (NESHAP for Industrial, Commercial and Institutional Boilers, "Boiler MACT"). The requirements for each MACT standard are already included in JNAP's existing ROP.

Mack is considered a major source of HAPs and PTI 14-19A contains requirements specific to Auto MACT, RICE MACT, Boiler MACT, and OLD MACT. This application has been developed to combine the applicable emission units at the Mack facility that are subject to these MACT standards in Section 2 of the ROP.

2.4 Compliance Assurance Monitoring

A stationary source may be subject to the Compliance Assurance Monitoring (CAM) Rule (40 CFR Part 64) if the source is required to obtain an ROP and has emission units for which the following conditions are met:

- The emission unit is subject to a pollutant-specific emission limitation or standard.
- The emission unit uses a control device to achieve compliance with the pollutant-specific emission limitation or standard.
- The emission unit has potential pre-control emissions which are over 100 percent of the major source threshold amount (at a level considered to be major under the ROP Program) for the applicable pollutant.

JNAP:
JNAP is subject to the CAM rule, and currently relies on VOC emission control devices that operate in accordance with the CAM requirements referenced within the current ROP and outlined in the facility's existing CAM Plan. As part of this application package JNAP is submitting an updated CAM plan. The updated plan does not contain substantive changes to the use of emission control equipment but has been reformatted to be consistent with the current AQD CAM template for automotive assembly plants. The referenced Operations and Maintenance (O&M) Plan in the current ROP is now subsumed and included within the updated CAM plan. As noted above, the ROP redline markup also proposes to move the CAM/O&M Plan related obligations from the Appendix to FG-Controls.

Mack:
Mack is subject to the CAM rule as a result of this ROP application, and currently relies upon VOC emission control devices to meet the emission limits of PTI 14-19A. A CAM plan has been included as part of this submittal.

3.0 CONCLUSION

The ROP renewal/amendment application has appropriately identified the current applicable requirements for emission sources at both the JNAP and Mack facilities. These applicable requirements are based upon the sources included in the recent PTI 14-19A for Mack facility that need to be incorporated into the ROP as Section 2, as well as existing emission units in the current JNAP ROP that will comprise Section 1.

The Title V ROP renewal/amendment application for the FCA US LLC site, comprised of the JNAP and Mack facilities, has been submitted to the EGLE-AQD in accordance with the required application submittal requirements. It is anticipated that Administrative Completeness approval can be obtained after review by AQD.

APPENDIX A

ROP Renewal Application Forms – JNAP (Section 1) and Mack Facility (Section 2)
(Including copies of required PTIs, plans, etc.)

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

EGLE

RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

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

GENERAL INSTRUCTIONS

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

PART A: GENERAL INFORMATION

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

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
N2155	3711	336112	MI-ROP-N2155-2017	1

Source Name: FCA US LLC - Jefferson North Assembly Plant

Street Address: 2101 Conner Avenue

City	State	ZIP Code	County
Detroit	MI	48215	Wayne

Section/Town/Range (if address not available)

Source Description: Vehicle assembly operation consisting of a body shop; paint shop; and trim, chassis, and final assembly departments.

☒ Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.

OWNER INFORMATION

Owner Name	Section Number (if applicable)
FCA USA LLC	

Mailing address (☐ check if same as source address)

1000 Chrysler Dr.

City	State	ZIP Code	County	Country
Auburn Hills	MI	48326	Oakland	USA

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

SRN: N2155	Section Number (if applicable): 1

PART A: GENERAL INFORMATION (continued)

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

CONTACT INFORMATION

Contact 1 Name			Title	
Steven Szura			Environmental Specialist	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
313-515-1098		Steven.Szura@stellantis.com		

Contact 2 Name (optional)			Title	
Company Name & Mailing address (☐ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name			Title	
Joe Araujo			Plant Manager	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
248-672-0958		joe.araujo@stellantis.com		

Responsible Official 2 Name (optional)			Title	
Company Name & Mailing address (☐ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

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

SRN: N2155	Section Number (if applicable): 1

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

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

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

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

Name and Title of the Responsible Official (Print or Type)

Joe Araujo, Plant Manager

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

Signature of Responsible Official — **Date** October 29, 2021

SRN: N2155	Section Number (if applicable): 1

PART C: SOURCE REQUIREMENT INFORMATION

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

C1.	Actual emissions and associated data from **all** emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☒ Yes ☐ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68)	☐ Yes ☒ No
	If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	☐ Yes ☐ No
C4.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) emissions? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No, criteria pollutant potential emission calculations do not need to be included.	☐ Yes ☒ No
C5.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No, HAP potential emission calculations do not need to be included.	☐ Yes ☒ No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form.	☐ Yes ☒ No
	Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes ☒ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy.	☒ Yes ☐ No
	Is a CAM plan included with this application?	☒ Yes ☐ No
	If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or	☒
	2. Presumptively Acceptable Monitoring, if eligible	☐
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes, then a copy must be submitted as part of the ROP renewal application.	☐ Yes ☒ No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	☐ Yes ☒ No
☒	Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: **AI-JNAP-CAM**	

SRN: N2155	Section Number (if applicable): 1

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. ☒ Yes ☐ No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]
EU-ENG-EFP	East Fire Pump with diesel fired engine	212(4)(e)	R285(2)(g).

Comments:

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

SRN:	Section Number (if applicable): 1

PART E: EXISTING ROP INFORMATION

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

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If Yes, identify changes and additions on Part F, Part G and/or Part H.	☒ Yes ☐ No
E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identity the stack(s) that was/were not reported on applicable MAERS form(s).	☐ Yes ☒ No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If Yes, complete Part F with the appropriate information.	☐ Yes ☒ No
E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	☐ Yes ☒ No
Comments:	

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

SRN: N2155	Section Number (if applicable): 1

PART F: PERMIT TO INSTALL (PTI) INFORMATION

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

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

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (*Include Process Equipment, Control Devices and Monitoring Devices*)	Date Emission Unit was Installed/ Modified/ Reconstructed
33-20	Multiple	PTI 33-20 for refurbishment activities. This PTI will not be incorporated into the ROP as construction activities have not yet commenced.	TBD

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

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

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

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

Comments:

PTI 33-20 will not be incorporated into the ROP as construction activities have not yet commenced. Question F2. above is not applicable since the PTI 33-20 will not be rolled into the ROP at this time.

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

SRN: N2155	Section Number (if applicable): 1

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

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

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

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

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

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

Comments:

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

SRN: N2155	Section Number (if applicable): 1

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

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

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

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

SRN: N2155	Section Number (if applicable): 1

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

H8. Does the source propose to add, change and/or delete **emission limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Propose to add a new 370 HP diesel -fired emergency fire pump with model year of 2011 or later and a displacement of <30 liters/cylinder.

H9. Does the source propose to add, change and/or delete **material limit** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Propose to add a material limit for the new 370 HP diesel-fired emergency fire pump. Please refer to the ROP mark-up associated with this application.

H10. Does the source propose to add, change and/or delete **process/operational restriction** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Propose to add a process/operational restriction for the new 370 HP diesel-fired emergency fire pump. Please refer to the ROP mark-up associated with this application.

H11. Does the source propose to add, change and/or delete **design/equipment parameter** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Propose to add a design/equipment parameter for the new 370 HP diesel-fired emergency fire pump. Please refer to the ROP mark-up associated with this application.

H12. Does the source propose to add, change and/or delete **testing/sampling** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

1. Propose to add a testing/sampling requirement for the new 370 HP diesel-fired emergency fire pump. Please refer to the ROP mark-up associated with this application.
2. Propose the removal of the EU-Ecoat testing requirement in the existing ROP as the testing has been completed. Please refer to the ROP mark-up associated with this application.

H13. Does the source propose to add, change and/or delete **monitoring/recordkeeping** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Proposing O&M and CAM plan to be a single plan, and the removal of Appendix 3 and incorporation of the requirements in FG-Controls. Please refer to the ROP mark-up associated with this application.

H14. Does the source propose to add, change and/or delete **reporting** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Propose to add a reporting requirement for the new 370 HP diesel-fired emergency fire pump. Please refer to the ROP mark-up associated with this application.

SRN: N2155	Section Number (if applicable): 1

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

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Propose to add other requirements for the new 370 HP diesel-fired emergency fire pump. Please refer to the ROP mark-up associated with this application.	☒ Yes ☐ No
H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
☒ Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI-**JNAP-New Fire Pump	

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

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: N2155	Section Number (if applicable): 1

1. Additional Information ID
AI-JNAP-CAM

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Attached is JNAP's Compliance Assurance Monitoring (CAM) plan.

Page 1 of 1

FCA US LLC, Jefferson North Assembly Plant

Compliance Assurance Monitoring (CAM) Plan

I. BACKGROUND

FCA US LLC Jefferson North Assembly Plant (JNAP) is located at 2101 Conner Street, Detroit, Wayne County, Michigan. The facility consists of an automobile and light duty truck manufacturing plant. JNAP is considered a major source of volatile organic compounds (VOCs) and currently relies on thermal oxidizers (TOs), regenerative thermal oxidizers (RTOs), and rotary concentrator adsorption units for VOC control devices. CAM requirements are applicable to the thermal oxidizers and concentrators that abate VOC emissions from the coating processes within the automotive assembly paint shop.

A. Emission Units

Description: The surface coating application processes with VOC emissions abated by the RTO/TO/concentrators are the electrodeposition ("Ecoat") and three basecoat and clearcoat lines ("Topcoat"). Ecoat consists of a dip tank process where auto bodies are submerged in an Ecoat dip tank and are processed through a series of water spray rinse stages, and then a final curing oven. Each of the three Topcoat processes are followed by a curing oven.

Identification: EU-ECOAT, EU-TOPCOAT1, EU-TOPCOAT2, EU-TOPCOAT3

B. Applicable Regulations, Emission Limit, Monitoring Requirements

Permit Number(s): MI-ROP-N2155-2017

Emission Limits:

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Underlying Applicable Requirements
1. VOC	1085.8 TPY	12mth rolling time period at the end of each calendar month	FG-Facility	R 336.1225, R336. 1702(a), 40 CFR 52.21
2. VOC	4.8 lb/vehicle	12mth rolling time period at the end of each calendar month	FG-Facility	R 336.1225, R336. 1702(a), 40 CFR 52.21

Monitoring Requirements: Oxidizer combustion chambers' average temperatures and concentrator desorption gas inlet temperature.

C. Control Technology

The Ecoat application process curing oven is controlled by a system of two TOs. The Topcoat color booth abated zones are controlled by their own dedicated concentrator and RTO. Each Topcoat curing oven is controlled by their own TO.

FCA US LLC, Jefferson North Assembly Plant

Compliance Assurance Monitoring (CAM) Plan

II. MONITORING APPROACH

	Concentrator Temperature	Oxidizer Temperature
A. Indicator	Each concentrator desorption gas inlet temperature is measured with its own thermocouple. The temperatures are monitored continuously and recorded at equally spaced intervals at least once every 15 minutes.	Each oxidizer combustion temperature is measured by its own thermocouple, one per combustion chamber. The average reading of the multiple thermocouples (where present) is used for compliance. The temperature is monitored continuously and recorded at equally spaced intervals at least once every 15 minutes.
B. Indicator Range	The desorption gas inlet temperature shall be no more than 15°F below the average temperature from the most recent acceptable performance test.	The oxidizer temperature shall be a minimum temperature of the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average.
C. Bypass System Detection	FG-CONTROLS special condition no. VI.4 requires bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made.	

III. PERFORMANCE CRITERIA

	Desorption Temperature	Oxidizer Temperature
A. Data Representativeness	There is one thermocouple associated with each desorption unit. (Three units)	There is a thermocouple located in the combustion chamber of each oxidizer unit. (Eight units)
B. Verification of Operation Status	NA – The system is not new and has not been modified.	
C. QA/QC Practices and Criteria	Validate the accuracy of or recalibrate the thermocouples in the oxidizers a minimum of once every 12 months. In lieu of validation or recalibration, new, calibrated thermocouples can be installed.	

	Desorption Temperature	Oxidizer Temperature
D. Monitoring Frequency	Continuous, and recorded at equally spaced intervals at least once every 15 minutes.	
E. Data Collection Procedures and Averaging Period; and excursion determination	FCA collects the temperature records on its Factory Information System ("FIS") from the average of the multiple thermocouples. Further, the FIS system calculates three-hour averages of the combustion temperatures, and is available for reference, including when the data point falls below the minimum required temperature, per EU-ECOAT IV.1, EU-TOPCOAT1 IV.2 and 3, EU-TOPCOAT2 IV.2 and 3, EU-TOPCOAT3 IV.2 and 3. Excursions are defined as the following: a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements of FG-CONTROLS IX.1.a. b. A monitoring excursion is defined as a failure to properly monitor as required per of FG-CONTROLS IX.1.b and c. c. A monitoring excursion is defined as failure to properly implement and/or maintain the O&M plan required in special condition FG-CONTROLS III.1.	

IV. JUSTIFICATION

A. Rational for Selection of Performance Indicators

The average oxidizer combustion chamber temperatures and the concentrator inlet desorption gas temperatures were selected because it is indicative of the VOC destruction occurring within the oxidizers and removal in the concentrators and are both widely accepted method of monitoring. If the combustion chamber temperatures decrease significantly, then complete combustion may not occur, reducing the destruction efficiency. If the inlet desorption temperature decreases significantly, then proper VOC removal cannot take place, reducing removal efficiency. Therefore, the requirement to monitor temperature and maintain appropriate records is a justification for assuring VOC removal and destruction efficiency. Temperature monitoring is specifically identified in the monitoring/recordkeeping requirements under the current

ROP EU-ECOAT IV.1, EU-TOPCOAT1 IV.2 and 3, EU-TOPCOAT2 IV.2 and 3, EU-TOPCOAT3 IV.2 and 3, and FG-CONTROLS VI 1 and 2.

B. Rational for Selection of Indicator Ranges

The selected indicator for the oxidizers is the minimum average combustion chamber temperature required to meet 95% destruction efficiency. The selected indicator of the concentrators is maintaining the temperature above the temperature from the most recent acceptable performance test minus 15°F. Indicator temperatures for each unit are:

Source Tested Name	Incinerator Equipment	Compliance Point Temp (3 Hour Average)
E-COAT A (OVEN)	E-Coat Incinerator A	1265°F
E-COAT B (OVEN)	E-Coat Incinerator B	1275°F
EU-TOPCOAT 1 (Spray Booth)	Spray Booth 1 VOC Incinerator	1270°F
EU-TOPCOAT 2 (Spray Booth)	Spray Booth 2 VOC Incinerator	1270°F
EU-TOPCOAT 3 (Spray Booth)	Spray Booth 3 VOC Incinerator	1270°F
EUTOPCOAT 1 (OVEN)	Booth 1 Oven Incinerator	1310°F
EUTOPCOAT 2 (OVEN)	Booth 2 Oven Incinerator	1345°F
EUTOPCOAT 3 (OVEN)	Booth 3 Oven Incinerator	1345°F
EU-TOPCOAT 1 (Spray Booth Desorb)	Spray Booth 1 VOC Desorb	340°F
EU-TOPCOAT 2 (Spray Booth Desorb)	Spray Booth 2 VOC Desorb	340°F
EU-TOPCOAT 3 (Spray Booth Desorb)	Spray Booth 3 VOC Desorb	345°F

FCA US LLC, Jefferson North Assembly Plant

Compliance Assurance Monitoring (CAM) Plan

C. Performance Test

The most recent removal and destruction efficiency test dates and results can be found in the table below. These tests demonstrated compliance with the permit required minimum of 95% destruction efficiency.

Source Tested Name	Incinerator Equipment	VOC Destruction Efficiency (DE)	Test Date
E-COAT A (OVEN)	E-Coat Incinerator A	99.2%	January 25, 2019
E-COAT B (OVEN)	E-Coat Incinerator B	96.4%	January 25, 2019
EU-TOPCOAT 1 (Spray Booth)	Spray Booth 1 VOC Incinerator	97.4%	October 22, 2019
EU-TOPCOAT 2 (Spray Booth)	Spray Booth 2 VOC Incinerator	97.7%	October 22, 2019
EU-TOPCOAT 3 (Spray Booth)	Spray Booth 3 VOC Incinerator	97.5%	October 23, 2019
EUTOPCOAT 1 (OVEN)	Booth 1 Oven Incinerator	99.9%	November 17-20, 2020
EUTOPCOAT 2 (OVEN)	Booth 2 Oven Incinerator	98.9%	November 17-20, 2020
EUTOPCOAT 3 (OVEN)	Booth 3 Oven Incinerator	95.3%	November 17-20, 2020
EU-TOPCOAT 1 (Spray Booth Desorb)	Spray Booth 1 VOC Desorb	Removal Efficiency 89.6%	December 8, 2020
EU-TOPCOAT 2 (Spray Booth Desorb)	Spray Booth 2 VOC Desorb	Removal Efficiency 96.4%	November 17-20, 2020
EU-TOPCOAT 3 (Spray Booth Desorb)	Spray Booth 3 VOC Desorb	Removal Efficiency 86.2%	January 26, 2021

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

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: N2155	Section Number (if applicable): 1

1. Additional Information ID
AI-JNAP-New Fire Pump

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

As indicated in Section H and the associated TSD, JNAP replaced the existing East Fire Pump, EU-ENG-EFP, with a new diesel engine manufactured in 2019. The replacement engine is considered a "new" engine under the RICE MACT/NSPS, and the redline ROP includes the proposed content for the new fire pump in Flexible Group FG-CI-RICE-NEW consistent with the applicable NSPS and MACT requirements.

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

EGLE

RENEWABLE OPERATING PERMIT
RENEWAL APPLICATION FORM

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

GENERAL INSTRUCTIONS

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

PART A: GENERAL INFORMATION

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

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
N2155	3711	336112	MI-ROP-M4085-2015a	2

Source Name: FCA US, LLC – Detroit Assembly Complex Mack

Street Address: 4000 Saint Jean Street (formerly 11570 Warren Avenue East)

City	State	ZIP Code	County
Detroit	MI	48214	Wayne

Section/Town/Range (if address not available):

Source Description: Vehicle assembly operation consisting of a body shop; paint shop; and trim, chassis, and final assembly departments.

☒ Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.

OWNER INFORMATION

Owner Name	Section Number (if applicable)
FCA USA LLC	

Mailing address (☐ check if same as source address): 1000 Chrysler Dr.

City	State	ZIP Code	County	Country
Auburn Hills	MI	48326	Oakland	USA

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

SRN: N2155	Section Number (if applicable): 2

PART A: GENERAL INFORMATION (continued)

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

CONTACT INFORMATION

Contact 1 Name			Title	
Rebecca Payne			Environmental Specialist	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
313-423-4552		rebecca.payne@stellantis.com		

Contact 2 Name (optional)			Title	
Paul Diven			Environmental Specialist	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
313-212-2588		Paul.diven@stellantis.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name			Title	
Michael Brieda			Plant Manager	
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
313-252-6500		Michael.brieda@stellantis.com		

Responsible Official 2 Name (optional)			Title	
Company Name & Mailing address (☐ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

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

SRN: N2155	Section Number (if applicable): 2

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

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

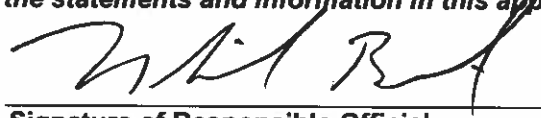
Listing of ROP Application Contents. Check the box for the items included with your application.	
☒ Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	☒ Compliance Plan/Schedule of Compliance
☒ Mark-up copy of existing ROP using official version from the AQD website (required)	☐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

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

Name and Title of the Responsible Official (Print or Type)

Michael Brieda, Plant Manager

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



Signature of Responsible Official

10/29/2021

Date

SRN: N2155	Section Number (if applicable): 2

PART C: SOURCE REQUIREMENT INFORMATION

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

C1.	Actual emissions and associated data from **all** emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes, identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	☐ Yes ☒ No
C2.	Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	☒ Yes ☐ No
C3.	Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes, a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	☐ Yes ☒ No ☐ Yes ☐ No
C4.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) emissions? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No, criteria pollutant potential emission calculations do not need to be included.	☒ Yes ☐ No
C5.	Has this stationary source **added or modified** equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes, include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No, HAP potential emission calculations do not need to be included.	☒ Yes ☐ No
C6.	Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes, identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	☐ Yes ☒ No
C7.	Are any emission units subject to the federal Acid Rain Program? If Yes, identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	☐ Yes ☒ No ☐ Yes ☒ No
C8.	Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes, identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	☒ Yes ☐ No ☒ Yes ☐ No ☒ ☐
C9.	Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes, then a copy must be submitted as part of the ROP renewal application.	☒ Yes ☐ No
C10.	Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes, then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	☐ Yes ☒ No

☒ Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: **AI-**DACM-PTE, AI-DACM-CAM, and AI-DACM-MAP

SRN: N2155	Section Number (if applicable): 2

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. ☐ Yes ☒ No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]

Comments:

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

SRN: N2155	Section Number (if applicable): 2

PART E: EXISTING ROP INFORMATION

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

E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If Yes, identify changes and additions on Part F, Part G and/or Part H.	☒ Yes ☐ No
E2. For each emission unit(s) identified in the existing ROP, all stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were not reported in the most recent MAERS reporting year? If Yes, identity the stack(s) that was/were not reported on applicable MAERS form(s).	☐ Yes ☒ No
E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If Yes, complete Part F with the appropriate information.	☐ Yes ☒ No
E4. Have any emission units identified in the existing ROP been dismantled? If Yes, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.	☐ Yes ☒ No

Comments:

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

SRN: N2155	Section Number (if applicable): 2

PART F: PERMIT TO INSTALL (PTI) INFORMATION

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

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

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (*Include Process Equipment, Control Devices and Monitoring Devices*)	Date Emission Unit was Installed/ Modified/ Reconstructed
14-19A	Multiple	PTI 14-19A for the Detroit Assembly Complex Mack plant will be added as Section 2 to the existing JNAP ROP	Constructed – 2020

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

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

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

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

Comments:
The emission units list and their details are included in the form **AI-DACM-EUlist** and any proposed changes to the PTI 14-19A are included as a redline markup of the permit and is included herein as **AI-DACM-PTI14-19A.**

☒ Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-**DACM-PTI14-19A and AI-DACM-EUlist.

SRN: N2155	Section Number (if applicable): 2

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

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

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

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

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

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

Comments:

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

SRN: N2155	Section Number (if applicable): 2

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

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

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

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

SRN: N2155	Section Number (if applicable): 2

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

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

SRN: N2155	Section Number (if applicable): 2

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

H15.	Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H16.	Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No
H17.	Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.	☐ Yes ☒ No

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

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

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: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-Compliance Plan 1

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

FCA US LLC, Detroit Assembly Complex Mack ("Mack") was issued a Violation Notice ("VN") by the AQD on September 20, 2021, alleging noncompliance with General Condition No. 6 of PTI 14-19a (and "unreasonable interference with the comfortable enjoyment of life and property") related to the presence of nuisance odors observed by AQD staff. On October 11, 2021, FCA provided a written response to the VN that includes the actions initiated and planned for identifying and correcting potential odor emissions related to the operation at Mack. The activities noted in the VN response constitute the facility's compliance plan and commitment to ensuring consistent compliance with PTI General Condition No. 6.

The actions FCA has and will pursue relative to investigating potential sources of objectionable odor and taking steps to eliminating them are summarized below:

Investigations:

- Odor Complaint Review Process: Includes logging: the complaint, production and atmospheric conditions at the time of complaint, evaluate odors off-site, consider possible sources.
- Routine Odor Monitoring Program: Routine on-site odor monitoring to determine trends and potential sources
- Third Party Expertise for on-site evaluation and study. Results will aid in evaluating mitigation options.
- Some presumptive actions have already been implemented, including sludge container coverings and access doors closure program.
- Evaluate existing systems for operation optimization opportunities, including the sludge treatment process and maintaining spray booth balance.

The investigations, study, associated results and plan for further odor control measures are anticipated to be completed and provided to the AQD on or about January 9, 2022.

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

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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	SRN: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-Compliance Plan 2

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

FCA US LLC, Detroit Assembly Complex Mack ("Mack") was issued a Violation Notice ("VN") by the AQD dated October 20, 2021, alleging noncompliance with PTI 14-19a, Special Condition IV.1 of EUPRIMER, regarding the ducting of EUPRIMER ambient flash zones emissions to regenerative thermal oxidizer control. A response to the VN is currently under development and is due November 10, 2021. FCA is committed to correcting the alleged cited violation and is currently evaluating viable engineering solutions to route the primer ambient flash exhaust to VOC abatement control. The specific design and schedule is under development and will be communicated to the AQD as soon as finalized. The AQD will be regularly appraised as to the status of the project. Note that FCA has confirmed that the VOC emissions from the facility have been, and will continue to be, in compliance with the permit limits. In addition, the air dispersion modeling associated with the PTI application has been reassessed which confirms that the emissions continue to be within the applicable thresholds without the primer ambient flash zone exhaust routed to the regenerative thermal oxidizer. FCA anticipates providing the AQD with the details of the selected corrective action in response to the Violation Notice due on or before November 10, 2021.

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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	SRN: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-PTE

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

The PTE for criteria pollutants for DACM is based upon limits within PTI 14-19A as follows:

Pollutant	Potential Emissions (Tons/yr)
VOCs	381.2 tpy
PM	5.54 tpy
PM10	5.54 tpy
PM2.5	5.54 tpy
NO_x	33.72 tpy
CO	76.47 tpy
SO_2	0.55 tpy
GHGs as CO_2e	106,518 tpy

The PTE for HAPs at DACM is based upon the AUTOMACT limits and VOC PTE within PTI 14-19A.

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

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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SRN: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-EUlist

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUPRETREAT	Pretreatment of vehicle surface to prepare it for E-coat, consisting of a water-based wash system.	October 2020	FGAUTOASSEMBLY, FGAUTOMACT
EUECOAT	An electrodeposition (E-coat) coating process consisting of a series of dip tanks, rinses, a curing oven, a cooling tunnel, followed by a prep booth (light sanding) and spot prime coating booth. Repairs will take place in a prep booth (light sanding), followed by the manual application of a small amount of flash prime coating in a spot prime coating booth. Emissions from the E-coat tanks and curing oven are controlled by an RTO. Emissions from the prep booth are filtered, recirculated, and exhausted in-plant. Emissions from the spot prime booth are filtered and exhausted to atmosphere.	October 2020	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT
EUSLR/ADH/DEAD	Various manual and robotic sealer, adhesive, and sound deadener material application stations/booths. Deadeners are applied in the body shop or paint shop. Sealers and adhesives are applied at various decks in the paint shop, body shop and final assembly area.	March 2020	FGAUTOASSEMBLY, FGAUTOMACT FGCONTROLS
EUPURFOAM	Polyurethane foam application process Exhausted to the general in-plant environment.	March 2020	FGAUTOASSEMBLY, FGAUTOMACT
EUGLASSBOND	Installation of glass to the coated automobile in the final assembly area. Glass bonding emissions are emitted to the general in-plant environment.	March 2020	FGAUTOASSEMBLY, FGAUTOMACT
EUPRIMER	A prep tunnel, two (2) primer booths, one for main primer and one for tutone coloring primer, followed by curing in one of two primer ovens, a cooling tunnel, and two sanding booths (color prep and reprocess heavy sand) for repair of surface blemishes.	October 2020	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT

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

EGLE

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SRN: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-EUlist

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUTOPCOAT	An automatic topcoat spray application process with two parallel lines consisting of a waterborne basecoat, a heated flash-off area, a solvent-borne clearcoat, and a curing oven. Approximately 85% of the air from the spray zones is recirculated back into the process and 15% is exhausted to the concentrator and RTO.	October 2020	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT
EUPURGECLEAN	Various cleaning solvents and purge solvents used in the manufacturing of automobiles. VOC emissions from the solvent-borne purge materials used within clearcoat booths are controlled by the RTO except when collected in the purge collection system.	October 2020	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT,
EUBODYWIPE	Pre-moistened body wipes used throughout the plant in the manufacturing of automobiles.	March 2020	FGAUTOASSEMBLY, FGAUTOMACT
EUFLUIDFILL	Each new vehicle will be filled with various fluids such as antifreeze, transmission fluid, power steering fluid, and windshield washer fluid.	June 2020	FGAUTOASSEMBLY
EUFUELFILL	Gasoline filling operation vehicle fuel filling operations. Vehicles being filled with gasoline shall be equipped with onboard refuelingvapor recovery (ORVR).	June 2020	FGAUTOASSEMBLY, FGFUEL
EUSPOTREPAIR	Coating spot repair and/or clean shop area for fixing slightly blemished vehicles. Emissions are exhausted through a dry filter particulate system and emitted to the ambient air.	October 2020	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT
EUFINALREPAIR	Final repair operations including a coating area. Emissions are exhausted to the general in-plant environment.	June 2020	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT
EUASH/AHU/SH	All air supply housing (ASH), air handling units (AHU), and space heating for the paint shop portion of the automobile assembly operations at the Detroit	January 2020	FGAUTOASSEMBLY, FGCONTROLS, FGNGEQUIP

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

EGLE

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SRN: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-EUlist

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUHWG1	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	October 2020	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG2	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	October 2020	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG3	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	October 2020	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG4	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	October 2020	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG5	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	October 2020	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG6	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	October 2020	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG7	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	October 2020	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG8	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	October 2020	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG9	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	October 2020	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUNEWNGMACK1&2	New Air Handling Units (AHU), Air Supply Housing (ASH) units, and space heating units installed at the Mack 1&2 building in conjunction with the Detroit Assembly Complex Mack Plant. All units are direct-fired, and the total heat input is equivalent to 74.7 MMBtu/hr.	January 2020	FGAUTOASSEMBLY, FGNGEQUIP FGCONTROLS

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

EGLE

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SRN: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-EUlist

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUGASTANK1	12,000-gallon bulk storage tank (Tank ID #T-801A) for the storage of gasoline	June 2020	FGAUTOASSEMBLY, FGFUEL, FGTANKS
EUGASTANK2	12,000-gallon bulk storage tank (Tank ID #T-801B) for the storage of gasoline	June 2020	FGAUTOASSEMBLY, FGFUEL, FGTANKS
EUCOOLANTTANK	20,000-gallon bulk storage tank (Tank ID #T-802) for the storage of coolant	June 2020	FGTANKS
EUMETANK1	6,000-gallon storage tank (Tank ID #T-804) for the storage of windshield washer fluid	June 2020	FGAUTOASSEMBL, FGFUEL, FGTANKS, FGOLD
EUMETANK2	6,000-gallon storage tank (Tank ID #T- 804B) for the storage of windshield washer fluid	June 2020	FGAUTOASSEMBLY, FGFUEL, FGTANKS, FGOLD
EUBRKTANK	10,000-gallon storage tank (Tank ID #T- 803) for the storage of brake fluid.	June 2020	FGTANKS
EUDIESELTANK1	500-gallon horizontal tank (Tank ID #1) used for storage of diesel fuel for fire pumps	1996	NA
EUDIESELTANK2	500-gallon horizontal tank (Tank ID #2) used for storage of diesel fuel for fire pumps	1996	NA
EUDIESELTANK3	500-gallon horizontal tank (Tank ID #3) used for storage of diesel fuel for fire pumps	2000	NA
EUEMERGEN1	An 850-HP natural gas-fired emergency engine	October 2020	FGNGEQUIP, FGNGEMENG1
EUEMERGEN2	An 850-HP natural gas-fired emergency engine	October 2020	FGNGEQUIP, FGNGEMENG1
EUEMERGEN3	A 350-HP natural gas-fired emergency engine	November 2020	FGNGEQUIP, FGNGEMENG2

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

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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	SRN: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-EUlist

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUEMERGEN4	A 350-HP natural gas-fired emergency engine	November 2020	FGNGEQUIP, FGNEEMENG2
EUFIREPUMP1	A 350-HP diesel-fired emergency fire pump engine with a model year of 2011 or later and a displacement of <30 liters/cylinder.	January 2020	FGFIREPUMP
EUFIREPUMP2	A 350-HP diesel-fired emergency fire pump engine with a model year of 2011 or later and a displacement of <30 liters/cylinder.	January 2020	FGFIREPUMP
EUFIREPUMP3	368 horse power diesel fueled emergency fire pump engine	January 1999	FG-FIREPUMP-EXIST
EUHEATERS	Existing air handling units from former engine manufacturing plant, burning natural gas fuel.	August 2002	FG-HEATERS

EGLE

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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	SRN: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-PTI14-19A

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Attached is DACM's current PTI 14-19A, with suggested clarifying changes as noted in redline/mark up. The requirements in this PTI should be wholly subsumed into the FCA JNAP ROP renewal as Section 2.

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

October 30, 2020

PERMIT TO INSTALL
14-19A

ISSUED TO
FCA US~~,~~ LLC, Detroit Assembly Complex Mack

LOCATED AT
4000 Saint Jean Street
Detroit, Michigan 48214

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
N2155

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201 (1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: July 13, 2020	
DATE PERMIT TO INSTALL APPROVED: October 30, 2020	SIGNATURE: Mary Ann Dolehanty
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

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
EUPRETREAT	Pretreatment of vehicle surface to prepare it for E-coat, consisting of a water-based wash system.	TBD	FGAUTOASSEMBLY, FGAUTOMACT
EUECOAT	An electrodeposition (E-coat) coating process consisting of a series of dip tanks, rinses, a curing oven, a cooling tunnel, followed by a prep booth (light sanding) and spot prime coating booth. Repairs will take place in a prep booth (light sanding), followed by the manual application of a small amount of flash prime coating in a spot prime coating booth. Emissions from the E-coat tanks and curing oven are controlled by an RTO. Emissions from the prep booth are filtered, recirculated, and exhausted in-plant. Emissions from the spot prime booth are filtered and exhausted to atmosphere.	TBD	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT
EUSLR/ADH/DEAD	Various manual and robotic sealer, adhesive, and sound deadener material application stations/booths. Deadeners are applied in the body shop or paint shop. Sealers and adhesives areapplied at various decks in the paintshop, body shop and final assembly area.	TBD	FGAUTOASSEMBLY, FGAUTOMACT FGCONTROLS
EUPURFOAM	Polyurethane foam application process exhausted to the general in-plant environment.	TBD	FGAUTOASSEMBLY, FGAUTOMACT
EUGLASSBOND	Installation of glass to the coated automobile in the final assembly area. Glass bonding emissions are emitted to the general in-plant environment.	TBD	FGAUTOASSEMBLY, FGAUTOMACT
EUPRIMER	A prep tunnel, two (2) primer booths, one for main primer and one for tutone coloring primer, followed by curing in one of two primer ovens, a cooling tunnel, and two sanding booths (color prep and reprocess heavy sand) for repair of surface blemishes.	TBD	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUTOPCOAT	An automatic topcoat spray application process with two parallel lines consisting of a waterborne basecoat, a heated flash-off area, a solvent-borne clearcoat, and a curing oven. Approximately 85% of the air from the spray zones is recirculated back into the process and 15% is exhausted to the concentrator and RTO.	TBD	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT
EUPURGECLEAN	Various cleaning solvents and purge solvents used in the manufacturing of automobiles. VOC emissions from the solvent-borne purge materials used within clearcoat booths are controlled by the RTO except when collected in the purge collection system.	TBD	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT,
EUBODYWIPE	Pre-moistened body wipes used throughout the plant in the manufacturing of automobiles.	TBD	FGAUTOASSEMBLY, FGAUTOMACT
EUFLUIDFILL	Each new vehicle will be filled with various fluids such as antifreeze, transmission fluid, power steering fluid, and windshield washer fluid.	TBD	FGAUTOASSEMBLY
EUFUELFILL	Gasoline filling operation vehicle fuel filling operations. Vehicles being filled with gasoline shall be equipped with onboard refueling vapor recovery (ORVR).	TBD	FGAUTOASSEMBLY, FGFUEL
EUSPOTREPAIR	Coating spot repair and/or clean shop area for fixing slightly blemished vehicles. Emissions are exhausted through a dry filter particulate system and emitted to the ambient air.	TBD	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT
EUFINALREPAIR	Final repair operations including a coating area. Emissions are exhausted to the general in-plant environment.	TBD	FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT
EUASH/AHU/SH	All air supply housing (ASH), air handling units (AHU), and space heating for the paint shop portion of the automobile assembly operations at the Detroit Assembly Complex Mack. All units are direct-fired and equipped with low NOx burners.	TBD	FGAUTOASSEMBLY, FGCONTROLS, FGNGEQUIP
EUHWG1	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	TBD	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG2	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	TBD	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG3	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	TBD	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUHWG4	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	TBD	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG5	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	TBD	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG6	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	TBD	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG7	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	TBD	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG8	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	TBD	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUHWG9	Hot water generator with a maximum heat input rating of 5 MMBtu/hr. This unit is equipped with a low NOx burner.	TBD	FGAUTOASSEMBLY, FGBOILERMACT, FGNGEQUIP
EUNEWNGMACK1&2	New Air Handling Units (AHU), Air Supply Housing (ASH) units, and space heating units installed at the Mack 1&2 building in conjunction with the Detroit Assembly Complex Mack Plant. All units are direct-fired, and the total heat input is equivalent to 74.7 MMBtu/hr.	TBD	FGAUTOASSEMBLY, FGNGEQUIP FGCONTROLS
EUGASTANK1	12,000-gallon bulk storage tank (Tank ID #T-801A) for the storage of gasoline	TBD	FGAUTOASSEMBLY, FGFUEL, FGTANKS
EUGASTANK2	12,000-gallon bulk storage tank (Tank ID #T-801B) for the storage of gasoline	TBD	FGAUTOASSEMBLY, FGFUEL, FGTANKS
EUCOOLANTTANK	20,000-gallon bulk storage tank (Tank ID #T-802) for the storage of coolant	TBD	FGTANKS
EUMETANK1	6,000-gallon storage tank (Tank ID #T-804) for the storage of windshieldwasher fluid	TBD	FGAUTOASSEMBLY, FGFUEL, FGTANKS, FGOLD
EUMETANK2	6,000-gallon storage tank (Tank ID #T-804B) for the storage of windshield washer fluid	TBD	FGAUTOASSEMBLY, FGFUEL, FGTANKS, FGOLD
EUBRKTANK	10,000-gallon storage tank (Tank ID #T-803) for the storage of brake fluid.	TBD	FGTANKS
EUDIESELTANK1	500-gallon horizontal tank (Tank ID #1) used for storage of diesel fuel for fire pumps	1996	NA
EUDIESELTANK2	500-gallon horizontal tank (Tank ID #2) used for storage of diesel fuel for fire pumps	1996	NA
EUDIESELTANK3	500-gallon horizontal tank (Tank ID #3) used for storage of diesel fuel for fire pumps	2000	NA
EUEMERGEN1	An 850-HP natural gas-fired emergency engine	TBD	~~FGNGEQUIP,~~ FGNGEMENG1
EUEMERGEN2	An 850-HP natural gas-fired emergency engine	TBD	~~FGNGEQUIP~~, FGNGEMENG1

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUEMERGEN3	A 350-HP natural gas-fired emergency engine	TBD	~~FGNGEQUIP,~~ FGNGEMENG2
EUEMERGEN4	A 350-HP natural gas-fired emergency engine	TBD	~~FGNGEQUIP,~~ FGNEEMENG2
EUFIREPUMP1	A 350-HP diesel-fired emergency fire pump engine with a model year of 2011 or later and a displacement of <30 liters/cylinder.	TBD	FGFIREPUMP
EUFIREPUMP2	A 350-HP diesel-fired emergency fire pump engine with a model year of 2011 or later and a displacement of <30 liters/cylinder.	TBD	FGFIREPUMP
EUFIREPUMP3	368 horsepower diesel fueled emergency fire pump engine	January 1999	FG-FIREPUMP-EXIST
EUHEATERS	Existing air handling units from former engine manufacturing plant, burning natural gas fuel.	August 2002	FG-HEATERS

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.

EUPRETREAT
EMISSION UNIT CONDITIONS

DESCRIPTION

Pretreatment of vehicle surface to prepare it for E-coat, consisting of a water-based wash system.

Flexible Group ID: FGAUTOASSEMBLY, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. No materials in EUPRETREAT shall contain any VOCs or HAPs that are emitted from the process. **(R 336.1225, R 336.1702)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep a record, acceptable to the AQD district supervisor, demonstrating that any VOC and/or HAP materials contained in the EUPRETREAT materials will not be emitted at the representative operating conditions. **(R 336.1225, R 336.1702)**

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. SVPHOSAIRSEAL	18	100	40 CFR 52.21(c) & (d)
2. SVPHOS2B	26	100	40 CFR 52.21(c) & (d)
3. SVPHOS5	30	100	40 CFR 52.21(c) & (d)
4. SVPHOS3	20	100	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).

EUECOAT
EMISSION UNIT CONDITIONS

DESCRIPTION

An electrodeposition (E-coat) coating process consisting of a series of dip tanks, rinses, a curing oven, a cooling tunnel, followed by a prep booth (light sanding) and spot prime coating booth. Repairs will take place in a prep booth (light sanding), followed by the manual application of a small amount of spot prime coating in a spot prime coating booth. Emissions from the E-coat tanks and the curing oven are controlled by an RTO. Emissions from the prep booth are filtered, recirculated, and exhausted in-plant. Emissions from the spot prime booth are filtered and exhausted to atmosphere.

Flexible Group ID: FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

An RTO for control of VOC emissions from the E-coat tank and curing oven. Dry filter particulate controls on the prep booth and spot~~flash~~ prime booth.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the electrodeposition tank and curing oven portions of EUECOAT unless FGCONTROLS is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of FGCONTROLS includes collecting desorption gas inlet temperature data above the temperature from the most recent acceptable performance test minus 15 degrees Fahrenheit and can be based upon a three-hour average. Satisfactory operation of FGCONTROLS includes maintaining a minimum RTO combustion chamber temperature at the manufacturer's recommended temperature until an acceptable performance testhas been performed, after which the RTO combustion chamber temperature shall be maintained at the temperature during the most recent control device performance test which demonstrated compliance with a minimum 95 percent destruction efficiency based upon a three-hour average, and a minimum retention time of 0.5 seconds. **(R 336.1225, R 336.1702, R 336.1910, R 336.2908)**

2. The permittee shall not operate the prep booth or the spot prime booth portions of EUECOAT unless the respective dry filter particulate controls are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the dry filter particulate controls includes conducting the required monitoring and recordkeeping pursuant to FGAUTOASSEMBLY, SC VI.2. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

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 the resin, pigment, and additives, as added to the EUECOAT tank, shall be determined using federal Reference Test Method 24 or an alternative approved by theAQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation

data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content and density of the resin, pigment and additives as added to the EUECOAT tank shall be verified by testing using federal Reference Test Method 24. **(R 336.2004, R 336.2040, R 336.2041, R 336.2908)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. 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 336.1225, R 336.1702)**

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. SVRTO	76	130	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVSPOTPRM	36	120	R 336.1225, 40 CFR 52.21(c) & (d)

3. The exhaust gases from the prep booth (light sanding) shall not be discharged to the ambient air at any time. **(R 336.1225, 40 CFR 52.21(c) & (d))**

IX. OTHER REQUIREMENT(S)

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

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

EUSLR/ADH/DEAD
EMISSION UNIT CONDITIONS

DESCRIPTION

Various manual and robotic sealer, adhesive, and sound deadener material application stations/booths. Deadeners are applied in the body shop or paint shop. Sealers and adhesives are applied at various decks in the paint shop, body shop and final assembly area.

Flexible Group ID: FGAUTOASSEMBLY, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content, water content and density of any sealer, adhesive, or deadener material as applied in EUSLR/ADH/DEAD, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content and density of any sealer, adhesive, or deadener material shall be verified by testing using federal Reference Test Method 24. **(R 336.2004, R 336.2040, R 336.2041, R 336.2908)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. 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 336.1225, R 336.1702)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and IIII, as they apply to EUSLR/ADH/DEAD.**(40 CFR Part 63, Subparts A and IIII)**

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

EUPURFOAM
EMISSION UNIT CONDITIONS

DESCRIPTION

Polyurethane foam application process exhausted to the general in-plant environment.

Flexible Group ID: FGAUTOASSEMBLY, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content, water content and density of any material as applied in EUPURFOAM, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content and density of any sealer, adhesive, or deadener material shall be verified by testing using federal Reference Test Method 24. **(R 336.2004, R 336.2040,R 336.2041, R 336.2908)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. 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 336.1225, R 336.1702)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

EUGLASSBOND
EMISSION UNIT CONDITIONS

DESCRIPTION

Installation of glass to the coated automobile in the final assembly area. Glass bonding emissions are emitted to the general in-plant environment.

Flexible Group ID: FGAUTOASSEMBLY, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content, water content and density of any sealer or adhesive as applied in EUGLASSBOND, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulationdata. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content and density of any sealer, adhesive, or deadener material shall be verified by testing using federal Reference Test Method 24. **(R 336.2004, R 336.2040, R 336.2041, R 336.2908)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each glass bonding material, including the weight percent of each component. 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 336.1225, R 336.1702)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and IIII, as they apply to EUGLASSBOND~~SLR/ADH/DEAD~~.**(40 CFR Part 63, Subparts A and IIII)**

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

EUPRIMER
EMISSION UNIT CONDITIONS

DESCRIPTION

A prep tunnel, two (2) automatic primer booths, one for solventborne main primer and one for solventborne tutone coloring primer, a primer observation zone, an ambient flash-off area, two natural gas-fired primer ovens, a cooling tunnel, and two booths (color prep and reprocess heavy sand) for repair of surface blemishes.

Flexible Group ID: FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

Dry filter particulate controls on the color prep booth and reprocess heavy sand booth are recirculated and not exhausted into the ambient air. Coating booth overspray will be controlled by a waterwash particulate control system. A portion of the primer coating booth exhaust will be filtered and recirculated to the booth air make-up system. The primer coating booth and flash-off area emissions are exhausted through a bank of particulate filters, the concentrator, and the RTO. Oven emissions are exhausted directly to the RTO. Emissions from the observation zone are controlled by a particulate control system and exhausted to the ambient air.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the coating booth, ambient flash, or curing oven portions of EUPRIMER unless FGCONTROLS is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of FGCONTROLS includes collecting desorption gas inlet temperature data above the temperature from the most recent acceptable performance test minus 15 degrees Fahrenheit and can be based upon a three-hour average. Satisfactory operation of FGCONTROLS includes maintaining a minimum RTO combustion chamber temperature at the manufacturer's recommended temperature until an acceptable performance test has been performed; after which the RTO combustion chamber temperature shall be maintained at the temperature during the most recent control device performance test which demonstrated compliance with a minimum 95 percent destruction efficiency based upon a three-hour average, and a minimum retention time of 0.5 seconds. **(R 336.1225, R 336.1702, R 336.2908)**

2. The permittee shall not operate the primer spray booth portion of EUPRIMER unless the waterwash systems are installed, maintained, and operated in a satisfactory manner. The permittee shall not operate the primer color prep booth and heavy sand booth portions of EUPRIMER unless the respective dry filter particulate control systems are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the water wash and dry filter system particulate controls includes conducting the required monitoring and recordkeeping pursuant to FGAUTOASSEMBLY, SC VI.2. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

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 or material as applied and as received, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulationdata. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of any coating or material shall be verified using federal Reference Test Method 24. **(R 336.1702, R 336.2004,R 336.2040, R 336.2041, R 336.2908(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. 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 336.1225, R 336.1702)**

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. SVPRMOBS	48	120	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVBOOTHCONC	94	130	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVRTO	76	130	R 336.1225, 40 CFR 52.21(c) & (d)

4. The exhaust gases from the color prep booth and the reprocess heavy sand booth portions of EUPRIMER shall not be discharged to the ambient air at any time. **(R 336.1225, 40 CFR 52.21(c) & (d))**

IX. OTHER REQUIREMENT(S)

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

2. The permittee shall comply with all applicable provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and MM, as they apply to EUPRIMER. **(40 CFR 60.390)**

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

EUTOPCOAT
EMISSION UNIT CONDITIONS

DESCRIPTION

An automatic topcoat spray application process with two parallel lines, each consisting of a waterborne basecoat coating booth, a basecoat observation zone, a basecoat ambient flash-off area, a basecoat heated flash-off area, a solvent-borne clearcoat coating booth, a clearcoat observation zone, a clearcoat ambient flash-off area, and a natural gas-fired curing oven. Approximately 85 percent of the air from the spray zones is recirculated back into the process and 15 percent is exhausted to the concentrator~~denser~~ and RTO.

Flexible Group ID: FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

Booth overspray will be controlled by a waterwash particulate control system. A portion of the basecoat and clearcoat exhaust will be filtered and recirculated to the booth air make up system. All booth and heated flash-off exhausts will be routed through a bank of particulate filters, the concentrator, and the RTO. Oven emissions are exhausted directly to the RTO. Solvent-Based robots (clearcoat) will capture and recover coatings and cleaning solvents ina purge pot collection system. Emissions from the observation and ambient flash zones are controlled by a particulate control systemand exhausted to atmosphere.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the basecoat coating booth, clearcoat coating booth, ~~basecoat~~ heated flash-off~~, clearcoat flash-off,~~ or any curing oven portions of EUTOPCOAT unless FGCONTROLS is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of FGCONTROLS includes collecting desorption gas inlet temperature data above the temperature from the most recent acceptable performance test minus 15 degrees Fahrenheit and can be based upon a three-hour average. Satisfactory operation of FGCONTROLS includes maintaining a minimum RTO combustion chamber temperature at the manufacturer's recommended temperature until an acceptable performance test has been performed; after which the RTO combustion chamber temperature shall be maintained at the temperature during the most recent control device performance test which demonstrated compliance with a minimum 95 percent destruction efficiency based upon a three-hour average, and a minimum retention time of 0.5 seconds. **(R 336.1225, R 336.2908(3))**

2. The permittee shall not operate the spray booth portions, ~~flash-off areas, and observation zones~~ of EUTOPCOAT unless the water wash system is installed, maintained, and operated in a satisfactory manner. The permittee shall not operate the spray booth, observation zones and flash-off areas of EUTOPCOAT unless the dry filter system is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the water wash system includes conducting the required monitoring and recordkeeping pursuant to FGAUTOASSEMBLY, SC VI.2. **(R 336.1205, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

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 or material as applied and as received, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of any coating or material shall be verified using federal Reference Test Method 24. **(R 336.2004, R 336.2040, R 336.2041, R 336.2908)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. 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 336.1225, R 336.1702)**

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. SVC1BCOBS (Color 1 BC Observation Zone)	40	120	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVC1CCOBS (Color 1 CC Observation Zone)	44	120	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVC2BCOBS (Color 2 BC Observation Zone)	40	120	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVC2CCOBS (Color 2 CC Observation Zone)	44	120	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVBOOTHCONC	94	130	R 336.1225, 40 CFR 52.21(c) & (d)
6. SVRTO	76	130	R 336.1225, 40 CFR 52.21(c) & (d)
7. SVC1OVHT (Color 1 oven heater box)	10	120	R 336.1225, 40 CFR 52.21(c) & (d)
8. SVC2OVHT (Color 2 oven heater box)	10	120	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

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

2. The permittee shall comply with all applicable provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and MM, as they apply to EUPRIMER. **(40 CFR 60.390)**

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

EUPURGECLEAN
EMISSION UNIT CONDITIONS

DESCRIPTION

Various cleaning solvents and purge solvents used in the manufacturing of automobiles. VOC emissions from the solvent based purge materials used within the primer and clearcoat booths are controlled by the concentrator and RTO except when collected in the purge collection system.

Flexible Group ID: FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

Solvent-Based robots (primer and clearcoat) will capture and recover coatings and cleaning solvents in a purge pot collection system. Waterborne basecoat purge is not controlled. Primer and clearcoat purge solvents not captured in the collection system will be controlled by the concentrator and RTO.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not process solventborne purge materials in the coating booth portions of EUPRIMER and the clearcoat coating booth portions of EUTOPCOAT unless the RTO portion of FGCONTROLS is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of FGCONTROLS includes collecting desorption gas inlet temperature data above the temperature from the most recent acceptable performance test minus 15 degrees Fahrenheit and can be based upon a three-hour average. Satisfactory operation of FGCONTROLS includes maintaining a minimum RTO combustion chamber temperature at the manufacturer's recommended temperature until an acceptable performance test has been performed; after which the RTO combustion chamber temperature shall be maintained at the temperature during the most recent control device performance test which demonstrated compliance with a minimum 95 percent destruction efficiency based upon a three-hour average, and a minimum retention time of 0.5 seconds. **(R 336.1225, R 336.2908(3))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. 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 336.1225, R 336.1702)**

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. SVBOOTHCONC	94	130	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVRTO	76	130	R 336.1225, 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).

EUBODYWIPE
EMISSION UNIT CONDITIONS

DESCRIPTION

Body wipes used throughout the plant in the manufacturing of automobiles.

Flexible Group ID: FGAUTOASSEMBLY, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. 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 336.1225, R 336.1702,R 336.1908)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

EUFLUIDFILL
EMISSION UNIT CONDITIONS

DESCRIPTION

Each new vehicle will be filled with various fluids such as antifreeze, transmission fluid, power steering fluid, and windshield washer fluid.

Flexible Group ID: FGAUTOASSEMBLY.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. 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 336.1225, R 336.1702)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

EUSPOTREPAIR
EMISSION UNIT CONDITIONS

DESCRIPTION

Rapid reprocess coating spot repair and/or clean shop area for fixing slightly blemished vehicles.

Flexible Group ID: FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

Dry filter particulate controls.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUSPOTREPAIR unless the dry filter particulate controls are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the particulate controls includes conducting the required monitoring and recordkeeping pursuant to FGAUTOASSEMBLY, SC VI.2. **(R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

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 or material, as applied and as received, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulationdata. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of any coating or material shall be verified using federal Reference Test Method 24. **(R 336.2004, R 336.2040,R 336.2041, R 336.2908)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. 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 336.1225, R 336.1702)**

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. SVRPRCS	78	120	R 336.1225, 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).

EUFINALREPAIR
EMISSION UNIT CONDITIONS

DESCRIPTION

Final repair operations including a coating area. Emissions are exhausted to the general in-plant environment.

Flexible Group ID: FGAUTOASSEMBLY, FGCONTROLS, FGAUTOMACT.

POLLUTION CONTROL EQUIPMENT

Dry filter particulate controls.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUFINALREPAIR unless the respective dry filter particulate controls are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the particulate controls includes conducting the required monitoring and recordkeeping pursuant to FGCONTROLS, SC VI.4. **(R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

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 or material, as applied and as received, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of any coating or material shall be verified using federal Reference Test Method 24. **(R 336.1702, R 336.2004, R 336.2040, R 336.2041, R 336.2908)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. 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 336.1225, R 336.1702)**

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:

1. The exhaust gases from EUFINALREPAIR shall not be discharged to the ambient air at any time. **(R 336.1225, 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).

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
FGAUTOASSEMBLY	This flexible group covers equipment used for the automotive assembly and painting operations for the Detroit Assembly Complex Mack Plant.	EUPRETREAT, EUECOAT, EUSLR/ADH/DEAD, EUPURFOAM, EUGLASSBOND, EUPRIMER, EUTOPCOAT, EUPURGECLEAN, EUBODYWIPE, EUFLUIDFILL, EUFUELFILL, EUSPOTREPAIR, EUFINALREPAIR, EUASH/ASH/SH, EUHWG1, EUHWG2, EUHWG3, EUHWG4, EUHWG5, EUHWG6, EUHWG7, EUHWG8, EUHWG9, EUNEWNGMACK1&2, EUGASTANK1, EUGASTANK2, EUMETANK1, EUMETANK2
FGCONTROLS	A concentrator unit and RTO used for control of VOC emissions from the paint spray booths, noted flash-off areas, and curing ovens. Waterwash or dry filter particulate control on paint spray booths and reprocessing/sanding/repair booths.	EUECOAT, EUSLR/ADH/DEAD, EUPRIMER, EUTOPCOAT, EUPURGECLEAN, ~~EUFUELFILL,~~ EUSPOTREPAIR, EUFINALREPAIR, EUASH/ASH/SH, EUNEWNGMACK1&2

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGAUTOMACT	Each new, reconstructed, or existing affected source as defined in Title 40 of the Code of Federal Regulations (CFR), Part 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts for new automobiles or new light duty trucks; AND/OR in which you choose to include, pursuant to 40 CFR 63.3082(c), any coating operations which apply coatings to new other motor vehicle bodies or body parts for new other motor vehicles; parts intended for use in new automobiles, new light duty trucks or new other motor vehicles; or aftermarket repair or replacement parts for automobiles, light duty trucks or other motor vehicles; and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 63.3081(c). This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.	EUPRETREAT, EUECOAT, EUSLD/ADH/DEAD, EUPURFOAM, EUGLASSBOND, EUPRIMER, EUTOPCOAT, EUPURGECLEAN, EUBODYWIPE, EUSPOTREPAIR, EUFINALREPAIR
FGBOILERMACT	Gas 1 Fuel Subcategory requirements for new Boilers/Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These new boilers or process heaters must comply with this subpart upon startup.	EUHWG1, EUHWG2, EUHWG3, EUHWG3, EUHWG4, EUHWG5, EUHWG6, EUHWG7, EUHWG8, EUHWG9
FGEMERENG1	Emergency engines subject to 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. New/Reconstructed emergency engines greater than 500 HP constructed on or after January 1, 2009.	EUEMERGEN1, EUEMERGEN2
FGEMERENG2	Emergency engines subject to 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. New/Reconstructed emergency engines less than 500 HP constructed on or after January 1, 2009.	EUEMERGEN3, EUEMERGEN4
FGFIREPUMP	Two (2) 350 HP diesel -fired emergency fire pumps with model years of 2011 or later and a displacement of <30 liters/cylinder.	EUFIREPUMP1, EUFIREPUMP2
FGFUEL	All gasoline storage tanks containing fuel and equipment used for vehicle fuel filling operations. Vehicles being filled with gasoline shall be equipped with on-board refueling vapor recovery (ORVR), Stage II oxidizer, or other equivalent vapor control system.	EUFUELFILL, EUGASTANK1, EUGASTANK2
FGNGEQUIP	All natural gas-fired equipment in the paint shop portion of the Detroit Assembly Complex Mack Plant, except the ~~three~~ four emergency generators, including air supply houses, space heaters, heated flash, cure ovens, the carbon concentrator, and the RTO, and Air Handling Units/Air Supply Houses installed at the Mack 1&2 building. The natural gas equipment at the Mack 1&2 building has a total heat input capacity of 74.7 MMBtu/hr.	EUECOAT, EUSLR/ADH/DEAD, EUPRIMER, EUTOPCOAT, EUASH/AHU/SH, EUNEWNGMACK1&2, EUHWG1, EUHWG2, EUHWG3, EUHWG4, EUHWG5, EUHWG6, EUHWG7, EUHWG8, EUHWG9

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGTANKS	Any existing (placed into operation before 7/1/79), new (placed into operation on or after 7/1/79) or modified storage tank, including those that are exempt from the requirements of R 336.1201 pursuant to R 336.1284.	EUGASTANK1, EUGASTANK2, EUMETANK1, EUMETANK2, EUCOOLANTTANK, EUBRKTANK
FGOLD	The affected source is each new, reconstructed, or existing Organic Liquid Distribution (OLD) (non-gasoline) operation that is located at, or is part of, a major source of hazardous air pollutant (HAP) emissions. The affected source is comprised of storage tanks, transfer racks, equipment leak components associated with storage tanks, transfer racks and pipelines, transport vehicles, and all containers while loading or unloading at transfer racks subject to this subpart. Equipment that is part of an affected source under another NESHAP is excluded from the affected source. **(40 CFR 63.2338(c))** These conditions specifically cover existing (construction pre dates April 2, 2002) liquid storagetanks which hold more than 5,000 gallons but less than 50,000 gallons and/or new liquid storage tanks which hold more than 5,000 gallons but less than 10,000 gallons of methanol/windshield washer fill solvents that are dispensed to newly assembled vehicles.	EUMETANK1, EUMETANK2
FG- FIREPUMP-EXIST	One (1) diesel fueled fire pump (compression ignition [CI]) subject to 40 CFR 63 Subpart ZZZZ, NESHAP for Reciprocating Internal Combustion Engines (RICE).	EUFIREPUMP3
FG-HEATERS	Existing air handling units from former engine manufacturing plant, burning natural gas fuel.	EUHEATERS

FGAUTOASSEMBLY
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group covers equipment used for the automotive assembly and painting operations for the entire Detroit Assembly Complex Mack Plant.

Emission Unit: EUPRETREAT, EUECOAT, EUSLR/ADH/DEAD, EUPURFOAM, EUGLASSBOND, EUPRIMER, EUTOPCOAT, EUPURGECLEAN, EUBODYWIPE, EUFLUIDFILL, EUFUELFILL, EUSPOTREPAIR, EUFINALREPAIR, EUASH/ASH/SH, EUHWG1, EUHWG2, EUHWG3, EUHWG4, EUHWG5, EUHWG6, EUHWG7, EUHWG8, EUHWG9, EUNEWNGMACK1&2, EUGASTANK1, EUGASTANK2, EUMETANK1, EUMETANK2.

POLLUTION CONTROL EQUIPMENT

A concentrator and RTO used for control of VOC emissions from primer booth, basecoat booths, clearcoat booths, and ~~all~~heated flash-off areas. RTO only used for control of VOC emissions from the E-Coat tank and curing oven, the primer curing oven, the basecoat curing ovens, and the clearcoat curing ovens. Water wash particulate controls on the prime, basecoat, and clearcoat booths. Dry filter particulate controls in the flash-off areas, spot repair booths, final repair booths, and all direct-fired natural gas equipment. Particulate controls on all observation zones.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	381.2[C,D] tpy	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	SC VI.1	R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2908(3)
2. VOC	3.0[C] pounds per job	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	SC VI.1	R 336.1702(a), R 336.2908
3. PM	5.54 tpy[A]	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	SC V.1, SC VI.1	R 336.1205(1)(a) & (b), 40 CFR 52.21(c) &(d)
4. PM10	5.54 tpy[A]	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	SC V.1, SC VI.1	R 336.1205(1)(a) & (b), 40 CFR 52.21(c) &(d)
5. PM2.5	5.54 tpy[A]	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	SC V.1, SC VI.1	R 336.1205(1)(a) & (b), 40 CFR 52.21(c) &(d)
6. NOx	33.72 tpy[B]	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	SC V.2, SC VI.1	R 336.1205(1)(a) & (b), 40 CFR 52.21(c) &(d)
7. CO	76.47 tpy[B]	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	SC VI.1	R 336.1205(1)(a) & (b), 40 CFR 52.21(c) &(d)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
8. SO2	0.55 tpy[B]	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	SC VI.1	R 336.1205(1)(a) & (b), 40 CFR 52.21(c) &(d)
9. GHGs as CO2e	106,518 tpy[B]	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	SC VI.1	R 336.1205(1)(a) & (b)

[A] This includes PM10/PM2.5 from all-natural gas combustion at the Detroit Assembly Complex Mack Paint Shop, and ASH/AHU equipment in the Mack1&2 building with a total heat input capacity equal to 74.7 MMBtu/hr. It also includes all other operations including the EUECOAT prep booth, EUPRIMER spray booths, color prep, and reprocess heavy sand booths, EUTOPCOAT spray booths, EUSPOTREPAIR, and EUFINALREPAIR. It does not include the four natural gas emergency engines or the two diesel fire pumps.

[B] This includes the emissions of this pollutant from all-natural gas combustion at the Detroit Assembly Complex Mack Paint Shop and ASH/AHU equipment in the Mack1&2 building with a total heat input capacity equal to 74.7 MMBtu/hr. It does not include the four emergency engines or the two diesel fire pumps.

[C] This limit does not include the four emergency engines or the two diesel fire pumps.

[D] Beginning on the startup of production, and continuing for the first 12 calendar months, this limit applies to the cumulative total VOC emissions. Thereafter, the limit shall become a 12-month rolling limit.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Natural Gas	1.821 Billion standard cubic feet per year[E]	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	SC VI.1	R 336.1205, R 336.1225, R 336.2908, 40 CFR 52.21 (c) & (d)

[E] This includes all natural gas combustion at the Detroit Assembly Complex Mack Paint Shop, and ASH/AHU equipment in the Mack1 & 2 building with a heat input capacity equal to 74.7 MMBtu/hr. It does not include the four natural gas emergency engines.

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each spray coating booth and observation zone with waterwash particulate controls, and all sanding booth operations with dry filter particulate controls. **(R 336.1301,R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))**

V. TESTING/SAMPLING

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

1. Within 365 days after saleable vehicle production, the permittee shall conduct initial testing and, at least once every five years thereafter unless the permittee documents annually that the most recent acceptable test remains valid and representative, the permittee shall verify PM, PM10, and PM2.5 emission rates from representative particulate emission units (or portions of emission units) as identified in a complete test plan

by testing at owner's expense, in accordance with Department requirements. One EU (or portion of an EU) may be tested if the permittee provides a demonstration to the AQD that the tested unit(s) is identical to and/or the emission rates from the tested unit(s) are representative of the other unit(s). Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A
PM10 / PM2.5	40 CFR Part 51, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. 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 336.1301, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**

2. Within 365 days after saleable vehicle production, the permittee shall conduct initial testing and, at least once every five years thereafter unless the permittee documents annually that the most recent acceptable test remains valid and representative, the permittee shall verify NOx emission rates from representative natural gas combustion units, the concentrator, and the RTO portions of FGAUTOASSEMBLY, as agreed to by the AQD District Supervisor, by testing at owner's expense, in accordance with Department requirements. One EU (or portion of an EU) may be tested if the permittee provides a demonstration to the AQD that the tested unit(s) is identical to and/or the emission rates from the tested unit(s) are representative of the other unit(s). Alternatively, the permittee may submit vendor guarantees for NOx emission rates from representative emission units in a manner acceptable to the AQD District Supervisor. 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. No less than 60 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 336.1205, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) & (d))**

3. Within 365 days of saleable vehicle production, the permittee shall conduct initial testing and, at least once every five years thereafter unless the permittee documents annually that the most recent acceptable test remains valid and representative, the permittee shall verify the overall transfer efficiency and the oven exhaust control device VOC loading of the primer booths, the basecoat booths, and the clearcoat booths, by testing at owner's expense, in accordance with Department requirements and the USEPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA-453/R-08-002, as amended. One basecoat booth and one clearcoat booth may be tested if the permittee provides a demonstration to the AQD that the tested booth(s) is identical to and/or the transfer efficiencies and VOC loading from the tested booth(s) are representative of the other booth(s).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 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2908)**

4. Within 365 days of saleable vehicle production, and at least once every five years from the last testing date thereafter unless the permittee has submitted an annual demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify the capture efficiency of a representative spray booth, flash-off area, observation zone, and oven portion of FGAUTOASSEMBLY to the respective VOC control device(s), by testing at owner's expense, in accordance with Department requirements, and the USEPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. Testing shall be performed using an approved EPA Method listed in 40 CFR 60, Appendix A and 40 CFR 63, Appendix A.

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 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 336.1702, R 336.2001, R 336.2003, R 336.2004,R 336.2908)**

5. Within 365 days of saleable vehicle production, the permittee shall conduct initial testing and, at least once every five years thereafter unless the permittee documents annually that the most recent acceptable test remains valid and representative, the permittee shall verify the removal efficiency of the concentrator and destruction efficiency of the RTO in FGAUTOASSEMBLY by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR 60 Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 60 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 336.1702, R 336.2001,R 336.2003, R 336.2004, R 336.2908)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep the following records/calculations in a format acceptable to the AQD District Supervisor. The permittee shall compile all required records and complete all required calculations and make them available within 30 days following the end of each calendar month for which records are required to be kept. These records shall also contain data, test documentation, and annual reviews which are necessary to perform calculations in the publication entitled "Protocol for Determining the Daily Volatile Compound Emission Rate of Automobile and Light-duty Truck Topcoat Operations", EPA-453/R-08-002, or as amended. (The Auto Protocol)
   a) For each material used in FGAUTOASSEMBLY:
      i. Material identification.
      ii. Material VOC content.
      iii. Material usage.
   b) The amount of natural gas burned during each calendar month and 12-month rolling time period, in cubic feet.
   c) Number of jobs each calendar month, where a job is defined as a painted vehicle leaving the assembly line.
   d) Calculations showing the FGAUTOASSEMBLY monthly emission rates, in tons per month, and annual mass VOC emission rates, as a cumulative emission rate for the first 12 months of operation and in tons per 12-month rolling time period, thereafter, as determined at the end of each calendar month. Calculations must show the capture and control efficiency of each control device used. Calculations must also include a sample calculation based on the production of a single job and that specifies all measured or assumed process parameters (e.g., transfer, capture and control efficiencies, booth splits, etc.) and VOC emissions due to natural gas combustion. Prior to the initial testing, for each controlled section, the design combined capture and control efficiency may be used. Thereafter, values no greater than the most recently tested values may be used.
   e) Calculations showing the VOC emission rate (lb/job) on a 12-month rolling basis, as determined at the end of each calendar month for the equipment covered by FGAUTOASSEMBLY.
   f) Calculations showing the PM, PM10, PM2.5, SO_2, NOx, and CO mass emission rates in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FGAUTOASSEMBLY. These calculations shall be done according to a method acceptable to the AQD District Supervisor and shall use AP-42 (or other agreed upon emission factors) or emission factors developed from the testing required in SC V.1 or SC V.2.

g) Calculations showing the GHGs as CO2e mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FGAUTOASSEMBLY.
h) Hours of operation for each calendar month and 12-month rolling time period.

All records/calculations shall be kept on file and made available to the Department upon request. **(R 336.1225, R 336.1301, R 336.1331, R 336.1702, R 336.2908(3), 40 CFR 52.21(c) & (d))**

2. The permittee shall monitor the condition of each particulate control system through weekly visual inspections. The permittee shall keep records of visual inspections of each exhaust filter system, or water wash particulate control system, which include the dates and results of the inspections, and the dates and reasons for repairs. All records shall be kept on file and made available to the Department upon request. **(R 336.1301, R 336.1331, 40 CFR 52.21(c) & (d))**

3. The permittee shall maintain a record of modifications to any add-on control equipment including any testing and monitoring to demonstrate satisfactory operation upon which compliance with any of the emission limits in FGAUTOASSEMBLY, SC I.1, 2, 3, 4, and 5 depends. **(R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.2908(3), 40 CFR 52.21(c) & (d))**

VII. REPORTING

1. For each emission unit (EU) and flexible group (FG) included in this permit, the permittee shall submit to the AQD District Supervisor, in an acceptable format, within 30 days following the end of the quarter in which the data was collected, the actual VOC, PM10, PM2.5, NOx, CO, SO_2, and GHGs as CO2e emission rates for each limit included in the permit. **(R 336.1205, R 336.1702, R 336.2908(3), 40 CFR 52.21(c) & (d))**

2. The permittee shall notify the AQD District Supervisor, in writing, of projects authorized by SC IX.3 and 4 at least 30 days prior to initialization of the activity. The notification shall include, at a minimum, a description of the type of project and any changes in testing, monitoring, recordkeeping, or other compliance evaluation activities. **(R 336.1201)**

~~3. Within 30 days of the start of producing saleable vehicles under this permit to install, the permittee shall provide the AQD District Supervisor written notification of the date that the first saleable vehicle was produced. **(R 336.1201)**~~

~~4. The permittee shall send written notification to the AQD District Supervisor within 30 days of startup of any emission unit in FGAUTOASSEMBLY. **(R 336.2908)**~~

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. This permit covers automotive body, paint, and assembly operations for the Detroit Assembly Complex Mack Plant. Changes to these operations or replacement with a different process type are subject to the requirements of R 336.1201, except as disallowed by R 336.1278 or as allowed by R 336.1279 through R 336.1291 or SC IX.3 or 4. **(R 336.1201)**

2. The Department has determined that compliance with the limits listed in SC I.1 and SC 1.2 provides a level of control that is at least equivalent to and not less stringent than the standards in 40 CFR 60.392, et seq. and R 336.1610. Accordingly, compliance with the limitations in this permit meets all applicable requirements of 40 CFR Part 60, Subpart MM and R 336.1610. **(R 336.1610, 40 CFR 60, Subpart MM)**

3. This permit authorizes any activities including projects involving physical changes or changes in the method of operation to existing emission units that do not require an increase in the emissions limits or performance levels specified in SC I.1 through SC 1.9. As a state only enforceable requirement[1], the changes to the emission unit(s) shall not result in a meaningful change in the nature or quantity of toxic air contaminants emitted from the stationary source. The permittee shall keep on file a demonstration, consistent with AQD Policy and Procedure number AQD-025, or according to the method outlined in SC IX.4. Such activities do not require the facility to obtain any federal or state air permits. **(R 336.1201)**

4. This permit authorizes projects involving the installation of new emission units that do not require an increase in the emissions limits or performance levels specified in SC I.1 through SC I.9 under the following conditions: **(R 336.1201)**
   a) As a state-only enforceable requirement, the new emission unit will not result in an exceedance of any air toxics standards found in Rule 336.1226 or Rule 336.1227. The permittee shall keep on file, a copy of all demonstrations that the air toxics impact from the new emission unit(s) will comply with the levels specified in Rule 336.1226 or Rule 336.1227. The permittee may devise its own method to perform this demonstration subject to approval by the department.[1]
   b) The new emissions unit will not be a newly constructed or reconstructed major source of hazardous air pollutants as defined in and subject to 40 CFR 63.2 and 40 CFR 63.5(b)(3), National Emission Standard for Hazardous Air Pollutants.
   c) The installation of the new emissions unit will not cause the violation of any applicable air requirement.
   d) A demonstration that the new installation meets these criteria shall be kept on site for the life of the new emission unit and made available to the department upon request. The permittee must notify the department of the installation of the new emission unit. This notification must contain the information specified in R 336.1215(3)(c)(i) through (v). Construction of the new emission unit may commence upon submittal of the notice.

5. The emission limits and performance levels specified in SC I.1 through SC I.9 may be reviewed and/or adjusted when newly applicable federal requirements or any other requirement that is enforceable as a practical matter and that the Department, under its State Implementation Plan, may impose on the facility become applicable during the term of the permit that would lower allowable emissions. Adjustments to SC I.1 through SC I.9 will be made through a permit revision as of the effective date of the new applicable requirements and will reflect the impact the new applicable requirements will have on the affected emission units. Initial compliance with the adjusted emission limits and performance levels will be demonstrated over the initial compliance period granted by the newly applicable federal requirement. **(R 336.1225,R 336.2908(3), 40 CFR 52.21(c) & (d))**

6. The permittee may, at any time, request that the Department terminate the flexible emission limit provisions of this permit and issue a traditional permit. In the event of such termination, the requirements of this permit shall remain in effect until a new permit is issued. At that time, the permit conditions for any existing emission unit that has not been modified and to which new requirements have not become applicable will revert to those found in the previous permits. For any new or modified emission unit, or any emission unit for which new requirements have become applicable the permit conditions will reflect requirements contemporaneous with the date of installation, modification, or new requirement applicability. **(R 336.1225, R 336.2908(3),40 CFR 52.21(c) & (d))**

7. The permittee shall implement an ambient air monitoring program at the facility. ~~No less than 180 days after beginning construction pursuant to Permit to Install No. 14-19, the permittee shall submit a monitoring plan for the ambient air monitoring program to the AQD Air Monitoring Unit for review and approval. The plan shall include specific information regarding the number of locations, pollutants to be monitored, instrumentation and methodologies proposed for operation of the monitoring sites. Following approval of a plan, the permittee shall begin monitoring all specified pollutants, according to the approved plan, no later than the date of startup of the Detroit Assembly Complex Mack Plant.~~ Monitoring shall continue for at least ten years.[3] **(R 336.1201(3))**

8. The permittee shall keep records of all air monitoring data collected in the air monitoring program. The permittee shall submit all records to the AQD Air Monitoring Unit in an acceptable format within 45 days following the end of the quarter in which the data were collected.[3] **(R 336.1201(3))**

~~9. The permittee shall work with the City of Detroit, through the Community Benefits Ordinance to identify additional projects for the community surrounding the facility. No less than 180 days after beginning construction pursuant to Permit to Install No. 14-19, the permittee shall submit to the AQD District Supervisor and AQD Permit Section Manager a plan for the additional projects for review and approval.[3] **(R 336.1201(3))**~~

Footnotes:
[1] This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[3] This condition is included at the request of the permittee.

FGCONTROLS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

A concentrator and RTO used for control of VOC emissions from the paint spray booths, noted flash-off areas, and curing ovens. Waterwash or dry filter particulate control on paint spray booths and reprocessing/sanding/repair booths.

Emission Unit: EUECOAT, EUSLR/ADH/DEAD, EUPRIMER, EUTOPCOAT, EUPURGECLEAN, ~~EUFUELFILL~~, EUSPOTREPAIR, EUFINALREPAIR, EUASH/AHU/SH, EUNEWNGMACK1&2.

POLLUTION CONTROL EQUIPMENT

A concentrator and RTO used for control of VOC emissions from EUPRIMER spray booth and flash-off areas, EUTOPCOAT spray booth and heated flash-off areas, and solventborne purge materials primer and clearcoat booths not captured in the purge collection system. An RTO only used for control of VOC emissions from the E-coat tank and curing oven, EUPRIMER curing ovens, and EUTOPCOAT curing ovens. Waterwash particulate control systems on all paint spray booths ~~and observation zones~~. Dry filter particulate control systems on all sanding and repair booths and observation and~~all~~ flash-off areas. Dry filter particulate control systems on all air supply housing (ASH), air handling units (AHU), and all curing ovens in the E-coat, primer, and topcoat operations.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGCONTROLS unless a malfunction abatement plan (MAP) is implemented and maintained as described in Rule 911(2), for the RTO, water wash, and dry filter particulate system add on control devices. The MAP shall be submitted to the AQD District Supervisor for review and approval. 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 336.1205, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2908, 40 CFR 52.21(c) & (d))**

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))**

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall install, maintain, and operate in a satisfactory manner, combustion chamber temperature monitoring devices for the thermal oxidizer in FGCONTROLS to monitor and record the temperature on a continuous basis during operation. Temperature data recording shall consist of measurements made at equally spaced intervals at least once every 15 minutes. All records shall be kept on file and made available to the Department upon request. **(R 336.1910, R 336.2908(3))**

2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, temperature monitoring devices for the concentrator in FGCONTROLS to monitor and record the desorption gas inlet temperature on a continuous basis during operation. Desorption gas inlet temperature data recording shall consist of measurements made at equally spaced intervals at least once every 15 minutes. All records shall be kept on file and made available to the Department upon request. **(R 336.1910)**

3. The permittee shall maintain records of maintenance and repair activities for FGCONTROLS. Records shall identify the equipment inspected and the date of the inspection. The permittee shall also record any maintenance activities or corrective actions taken as a result of equipment inspections or due to malfunction. All records shall be kept on file and made available to the Department upon request. **(R 336.1910)**

4. The permittee shall monitor the condition of each particulate control system through weekly visual inspections (except during weeks with no production) of each basecoat and clearcoat spray booths and monthly visual inspections of each heavy and spot repair booth and the E-coat sanding booth. The permittee shall keep records of visual inspections of each exhaust filter, wet eliminator, or water wash particulate control system which include the dates and results of the inspections, and the dates and reasons for repairs. All records shall be kept on file and made available to the Department upon request. **(R 336.1301, R 336.1331,R 336.1910, 40 CFR 52.21(c) & (d))**

5. The permittee shall maintain a record of modifications to any add-on control equipment including any testing and monitoring to demonstrate satisfactory operation upon which compliance depends. All records shall be kept on file and made available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1910, R 336.2908, 40 CFR 52.21(c) & (d))**

6. For the RTO, while in operation during production, the permittee shall conduct bypass monitoring for each bypass valve such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was open and the length of time the bypass was open shall be kept on file and made available to the Department upon request. **(R 336.1702, R 336.1910, R 336.2908)**

7. The permittee shall keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for the RTO control device used to demonstrate compliance with the applicable VOC emission limits: **(R 336.1910,R 336.1911)**
   a) Validation of thermocouple accuracy or recalibration of each temperature thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
   b) Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months.

c) Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months.
d) Perform quarterly pressure drop readings across the concentrator.

The requirement to address these items is also satisfied if a destruction efficiency test has been performed on the control device within the prior 18-month period. All records shall be kept on file and made available to the Department upon request.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

FGAUTOMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EUPRETREAT, EUECOAT, EUSLD/ADH/DEAD, EUPURFOAM, EUGLASSBOND, EUPRIMER, EUTOPCOAT, EUPURGECLEAN, EUBODYWIPE, EUSPOTREPAIR, EUFINALREPAIR.

POLLUTION CONTROL EQUIPMENT

A concentrator and RTO used for control of VOC emissions from portions of the painting operations and curing ovens.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Organic HAP	0.60 lb per GACS	Calendar Month	Existing– FGAUTOMACT with EUECOAT	SC III.3, SC V.1, SC VI.3	40 CFR 63.3090(a)
2. Organic HAP*	1.10 lb per GACS	Calendar Month	Existing– FGAUTOMACT	SC III.3, SC V.1, SC VI.3	40 CFR 63.3091(b)
3. Organic HAP	0.01 lb per lb of coating	Calendar Month	Existing– SEALERS & ADHESIVES	SC III.3, SC V.1, SC VI.3	40 CFR 63.3090(c) or 40 CFR 63.3091(c)
4. Organic HAP	0.01 lb per lb of coating	Calendar Month	Existing– Deadener Materials	SC III.3, SC V.1, SC VI.3	40 CFR 63.3090(d) or 40 CFR 63.3091(d)
• FGAUTOMACT includes Primer, Topcoat, Final Repair, Glass Bonding Primer, and Glass Bonding Adhesive operations plus all coatings and thinners, except for deadener materials and adhesive and sealers not part of glass bonding systems. • FGAUTOMACT WITH EUECOAT also includes Electrocoat operations in addition to all of the operations of FGAUTOMACT. • SEALERS & ADHESIVES include only adhesives and sealers that are not part of glass bonding systems.					
* Permittee may choose to comply with this limit if the requirements of Condition No. I.5 is met.					

5. The permittee may choose to comply with either SC I.1 or 2. SC I.2 may be chosen only if EUECOAT meets either of the following requirements. **(40 CFR 63.3092)**
   a) Each individual material added to EUECOAT contains no more than 1.0 percent by weight of any organic HAP and no more than 0.10 percent by weight of any OSHA-defined carcinogenic organic HAP; or,
   b) The emissions from all EUECOAT bake ovens are captured and ducted to the oven thermal oxidizer which achieves a minimum destruction efficiency of at least 95 percent (by weight).

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

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

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

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. The permittee shall perform the applicable performance tests and compliance demonstrations in accordance with 40 CFR 63.3150-3152, 40 CFR 63.3160-3161, 40 CFR 63.3163-3168, 40 CFR 63.3170-3171, and 40 CFR 63.3173. **(40 CFR Part 63, Subpart IIII)**

2. The permittee may rely upon the results of capture, destruction or transfer efficiency tests that have been previously conducted upon written approval from the AQD District Supervisor. Any such previous tests must meet the criteria identified in 40 CFR 63.3160(c)(1) through (3). **(40 CFR 63.3160)**

3. The permittee shall determine the mass fraction of each organic HAP for each material used according to the procedures established under 40 CFR 63.3151(a)(1) through (5). The permittee may use USEPA Method ALT-017 as an alternative for any material used, after demonstrating that its use as an alternative test methodology for that material, has been approved by the USEPA pursuant to the requirements of 40 CFR 63.3151(a)(3) and 40 CFR 63.7. **(40 CFR 63.7, 40 CFR 63.3151)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall conduct an initial compliance demonstration for the initial compliance period described in 40 CFR 63.3150-3151, 40 CFR 63.3160-3161, and 40 CFR 63.3170-3171. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3083 and ends on the last day of the month following the compliance date. If the initial date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next month. **(40 CFR 63.3150, 40 CFR 63.3160, 40 CFR 63.3170, 40 CFR 63.3083(a) & (b))**

2. The permittee shall keep all records as required by 40 CFR 63.3130 in the format and timeframes outlined in 40 CFR 63.3131. **(40 CFR 63.3152(c), 40 CFR 63.3163(j))**

3. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date, for each compliance period:
   a) A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart IIII and the documentation supporting each notification and report. **(40 CFR 63.3130(a))**
   b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP for each coating, thinner and cleaning material, the density for each coating and thinner, and the volume fraction of coating solids for each coating. **(40 CFR 63.3130(b))**
   c) For each coating or thinner used in FGAUTOMACT or FGAUTOMACT~~-PS2~~ with EUECOAT~~,~~ the volume used in each month, the mass fraction organic HAP content, the density, and the volume fraction of solids. **(40 CFR 63.3130(c))**
   d) For each material used in EUSLR/ADH/DEAD and EUGLASSBOND, the mass used in each month and the mass organic HAP content. **(40 CFR 63.3130(c))**
   e) Calculations of the organic HAP emission rate for FGAUTOMACT or FGAUTOMACT with EUECOAT in pounds per gallon of applied coating solids. If permittee chooses to comply with the option identified in Special Condition I.5.a., a record of the weight fraction of each organic HAP in each material added to the Electrocoat system. These calculations and records must include all raw data, algorithms, and intermediate calculations. If the ''Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations,'' EPA–450/3–88–018 (Docket ID No. OAR–2002–0093 and Docket ID No. A–2001–22), is used, all data input to this protocol must be recorded. If these data are maintained as electronic files, the electronic files, as well as any paper copies must be maintained. **(40 CFR 63.3130(c), 40 CFR 63.3163, 40 CFR 63.3173)**
   f) Calculation of the average monthly mass organic HAP content in pounds per pound of coating, separately for EUSLR/ADH/DEAD and EUGLASSBOND. **(40 CFR 63.3130(c), 40 CFR 63.3152)**
   g) The name, volume, mass fraction organic HAP content and density of each cleaning material used. **(40 CFR 63.3130(d) - (f))**
   h) Any additional records pertaining to deviations; startup, shutdown or malfunctions; emission capture systems; performance testing; capture and control efficiency determinations; transfer efficiency determinations; work practice plans; and design and operation of control and monitoring systems for any emission capture system or add-on control device upon which compliance with any of the emission limits in Special Conditions I.1 through I.4 depends, pursuant to 40 CFR 63.3130(g) through (o). **(40 CFR 63.3130(g) – (o))**
   i) Records pertaining to the design and operation of control and monitoring systems for any emission capture system or add-on control device upon which compliance with any of the emission limits in Special Conditions I.1 through I.4 depends must be maintained on-site for the life of the equipment in a location readily available to plant operators and inspectors. **(40 CFR 63.3130(o))**

VII. REPORTING

1. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.3120(a). The first time period covered by these reports shall be shortened so as to end on either June 30 or December 31, whichever comes first. These reports shall be due March 15 for the reporting period July 1 to December 31 and September 15 for the reporting period January 1 to June 30. **(40 CFR 63.3120(a))**

2. The Permittee shall submit applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), as specified in 40 CFR 63.3110. **(40 CFR 63, Subparts A and IIII)**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart IIII for Surface Coating of Automobiles and Light Duty Trucks by the initial compliance date as they apply to FGAUTOMACT. The permittee may choose an alternative compliance method not listed in FGAUTOMACT by providing the appropriate notifications required under 40 CFR Part 63.9(j), maintaining a log required by40 CFR Part 70.6(9), and by complying with all applicable provisions required by Subpart IIII for the compliance option chosen. **(40 CFR 70.6(a)(9), 40 CFR Part 63.9(j), 40 CFR Part 63, Subparts A and IIII)**

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

FGBOILERMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Gas 1 Fuel Subcategory requirements for new Boilers/Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These new boilers or process heaters must comply the applicable provisions of this subpart upon startup.

Emission Unit:

Less than 5 MMBtu/hr	NA
Equal to or greater than 5 MMBtu/hr and less than 10 MMBtu/hr	EUHWG1, EUHWG2, EUHWG3, EUHWG4, EUHWG5, EUHWG6, EUHWG7, EUHWG8, EUHWG9
Equal to or greater than 10 MMBtu/hr	NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall only burn fuels as allowed in the Unit designed to burn gas 1 subcategory definition in 40 CFR 63.7575. **(40 CFR 63.7499(l))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must meet the applicable requirements in paragraphs (a)(1) and (3) of 40 CFR 63.7500, as listed below, except as provided in paragraphs (b) and (e) of 40 CFR 63.7500, stated in SC III.2 and SC III.3. The permittee must meet these requirements at all times the affected unit is operating. **(40 CFR 63.7500(a))**
   a) The permittee must meet each work practice standard in Table 3 of 40 CFR Part 63, Subpart DDDDD that applies to the boiler or process heater, for each boiler or process heater at the source.**(40 CFR 63.7500(a)(1))**
   b) At all times, the permittee must operate and maintain any affected source (as defined in 40 CFR 63.7490, stated in SC IX.1), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that 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 63.7500(a)(3))**

2. As provided in 40 CFR 63.6(g), EPA may approve use of an alternative to the work practice standards. **(40 CFR 63.7500(b))**

3. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 of 40 CFR Part 63, Subpart DDDDD, or the operating limits in Table 4 of 40 CFR Part 63, Subpart DDDDD. Boilers and process heaters in the units designed to burn gas 1 fuel subcategory with a heat input capacity: **(40 CFR 63.7500(e))**
   a) Of less than or equal to 5 MMBtu per hour must complete a tune-up every five-years as specified in 40 CFR 63.7540, stated in SC IX.8. **(40 CFR 63.7500(e))**
   b) Greater than 5 MMBtu per hour and less than 10 MMBtu per hour must complete a tune-up every two-years as specified in 40 CFR 63.7540, stated in SC IX.8. **(40 CFR 63.7500(e))**

4. The permittee must demonstrate initial compliance with the applicable work practice standards in Table 3 to 40 CFR Part 63, Subpart DDDDD within the applicable annual, biennial, or five-year schedule as specified in 40 CFR 63.7515(d), stated in SC III.5, following the initial compliance date specified in 40 CFR 63.7495(a), stated in SC IX.4. Thereafter, you are required to complete the applicable annual, biennial, or five-year tune-up as specified in 40 CFR 63.7515(d), stated in SC III.5. **(40 CFR 63.7510(g))**

5. If the permittee is required to meet an applicable tune-up work practice standard, the permittee must:
   a) Conduct the first annual tune-up no later than 13-months after the initial startup of the new or reconstructed boiler or process heater, the first biennial tune-up no later than 25-months after the initial startup of the new or reconstructed boiler or process heater, or the first five-year tune-up no later than 61-months after the initial startup of the new or reconstructed boiler or process heater.
   b) Conduct an annual performance tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.8.a; biennial performance tune-up according to 40 CFR 63.7540(a)(11), stated in SC IX.8.b; or five-year performance tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.8.c. Each annual tune-up specified in 40 CFR 63.7540(a)(10) must be no more than 13-months after the previous tune-up. Each biennial tune-up specified in 40 CFR 63.7540(a)(11) must be conducted no more than 25-months after the previous tune-up. Each five-year tune-up specified in 40 CFR 63.7540(a)(12) must be conducted no more than 61-months after the previous tune-up. **(40 CFR 63.7515(d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The heat input capacity of each hot water generator in FGBOILERMACT shall not exceed a maximum of 10 MMBtu per hour. **(40 CFR Part 63, Subpart DDDDD)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee must keep records according to paragraphs (a)(1) and (2) of 40 CFR 63.7555, as listed below. **(40 CFR 63.7555(a))**
   a) A copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a)(1))**
   b) Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 CFR 63.10(b)(2)(viii). **(40 CFR 63.7555(a)(2))**

2. If the permittee operates a unit in the unit designed to burn gas 1 subcategory that is subject to 40 CFR Part 63, Subpart DDDDD, and the permittee uses an alternative fuel other than natural gas, refinerygas, gaseous fuel subject to another subpart under 40 CFR Part 63, other gas 1 fuel, or gaseous fuel subject to another subpart of 40 CFR Part 60 or Parts 61, Part 63, or Part 65, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. **(40 CFR 63.7555(h))**

3. 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 63.7560(a))**

4. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for five-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.7560(b))**

5. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least two-years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee can keep the records off site for the remaining three-years. **(40 CFR 63.7560(c))**

VII. REPORTING

1. The permittee must meet the notification requirements in 40 CFR 63.7545 according to the schedule in 40 CFR 63.7545, both stated in SC VII.6 through SC VII.8, and in Subpart A of 40 CFR Part 63. **(40 CFR 63.7495(d))**

2. The permittee must report each instance in which they did not meet each emission limit and operating limit in Tables 1 through 4 to this subpart that applies. These instances are deviations from the emission limits or operating limits, respectively, in this subpart. These deviations must be reported according to the requirements in 40 CFR 63.7550, cited in SC VII.9. **(40 CFR 63.7540(b))**

3. The permittee must submit to the Administrator all of the notifications in 40 CFR 63.7(b) and (c),40 CFR 63.8(e), (f)(4) and (6), and 40 CFR 63.9(b) through (h) that apply to the permittee by the dates specified. **(40 CFR 63.7545(a))**

4. As specified in 40 CFR 63.9(b)(2), if the permittee starts up the affected source before January 31, 2013, the permittee must submit an Initial Notification not later than 120 days after January 31, 2013.**(40 CFR 63.7545(b))**

5. As specified in 40 CFR 63.9(b)(4) and (5), if the permittee starts up the new or reconstructed affected source on or after January 31, 2013, the permittee must submit an Initial Notification not later than 15-days after the actual date of startup of the affected source. **(40 CFR 63.7545(c))**

6. If the permittee operates a unit designed to burn natural gas, refinery gas, or other gas 1 fuels that is subject to 40 CFR Part 63, Subpart DDDDD, and the permittee intends to use a fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart of 40 CFR Part 63, Part 60, Part 61, or Part 65, or other gas 1 fuel to fire the affected unit during a period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575, the permittee must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in 40 CFR 63.7575. The notification must include the information specified in paragraphs (f)(1) through (5) of 40 CFR 63.7545, as listed below. **(40 CFR 63.7545(f))**
   a) Company name and address. **(40 CFR 63.7545(f)(1))**
   b) Identification of the affected unit. **(40 CFR 63.7545(f)(2))**
   c) Reason the permittee is unable to use natural gas or equivalent fuel, including the date when the natural gas curtailment was declared, or the natural gas supply interruption began. **(40 CFR 63.7545(f)(3))**
   d) Type of alternative fuel that the permittee intends to use. **(40 CFR 63.7545(f)(4))**
   e) Dates when the alternative fuel use is expected to begin and end. **(40 CFR 63.7545(f)(5))**

7. If the permittee intends to commence or recommence combustion of solid waste, the permittee must provide 30 days prior notice of the date upon which the permittee will commence or recommence combustion of solid waste. The notification must identify: **(40 CFR 63.7545(g))**
   a) The name of the owner or operator of the affected source, as defined in 40 CFR 63.7490, stated in SC IX.1, the location of the source, the boiler(s) or process heater(s) that will commence burning solid waste, and the date of the notice. **(40 CFR 63.7545(g)(1))**
   b) The currently applicable subcategories under 40 CFR Part 63, Subpart DDDDD. **(40 CFR 63.7545(g)(2))**

c) The date on which the permittee became subject to the currently applicable emission limits. **(40 CFR 63.7545(g)(3))**
d) The date upon which the permittee will commence combusting solid waste. **(40 CFR 63.7545(g)(4))**

8. If the permittee has switched fuels or made a physical change to the boiler or process heater and the fuel switch or physical change resulted in the applicability of a different subcategory, the permittee must provide notice of the date upon which the permittee switched fuels or made the physical change within 30-days of the switch/change. The notification must identify: **(40 CFR 63.7545(h))**
   a) The name of the owner or operator of the affected source, as defined in 40 CFR 63.7490, stated in SC IX.1, the location of the source, the boiler(s) and process heater(s) that have switched fuels, were physically changed, and the date of the notice. **(40 CFR 63.7545(h)(1))**
   b) The currently applicable subcategory under 40 CFR Part 63, Subpart DDDDD. **(40 CFR 63.7545(h)(2))**
   c) The date upon which the fuel switch or physical change occurred. **(40 CFR 63.7545(h)(3))**

9. The permittee must submit each report in Table 9 of 40 CFR Part 63, Subpart DDDDD that applies. **(40 CFR 63.7550(a))**

10. Unless the EPA Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report, according to paragraph (h) of 40 CFR 63.7550, stated in SC VII.12, by the date in Table 9 of 40 CFR Part 63, Subpart DDDDD and according to the requirements in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below. For units that are subject only to a requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.8.a, biennial tune-up according to 40 CFR 63.7540(a)(11), stated in SC IX.8.b, or five-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.8.c, and not subject to emission limits or operating limits, the permittee may submit only an annual, biennial, or five-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below, instead of a semi-annual compliance report. **(40 CFR 63.7550(b))**
    a) The first semi-annual compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495, stated in SC IX.3, and ending on December 31 after the compliance date that is specified for the source in 40 CFR 63.7495, stated in SC IX.3. When submitting an annual, biennial, or five-year compliance report, the first compliance report must cover the period beginning on the compliance date specified for each boiler or process heater in 40 CFR 63.7495 and ending on December 31 within one, two, or five-years, as applicable, after the compliance date that is specified in 40 CFR 63.7495. **(40 CFR 63.7550(b)(1))**
    b) The first semi-annual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495, stated in SC IX.3. The first annual, biennial, or five-year compliance report must be postmarked or submitted no later than March 15. **(40 CFR 63.7550(b)(2), 40 CFR 63.7550(b)(5))**
    c) Each subsequent semi-annual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Annual, biennial, and five-year compliance reports must cover the applicable one, two, or five-year periods from January 1 to December 31. **(40 CFR 63.7550(b)(3))**
    d) Each subsequent semi-annual compliance report must be postmarked or submitted no later than September 15 or March 15, whichever date is the first date following the end of the semiannual reporting period. Annual, biennial, and five-year compliance reports must be postmarked or submitted no later than March 15. **(40 CFR 63.7550(b)(4), 40 CFR 63.7550(b)(5))**

11. A compliance report must contain the following information depending on how the permittee chooses to comply with the limits set in this rule. **(40 CFR 63.7550(c))**
    a) If the facility is subject to the requirements of a tune up the permittee must submit a compliance report with the information in paragraphs (c)(5)(i) through (iii), (xiv), and (xvii) of 40 CFR 63.7550.**(40 CFR 63.7550(c)(1))**
    b) 40 CFR 63.7550(c)(5) is as follows:
       i. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**
       ii. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**
       iii. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**

iv. Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.8.a, biennial tune-up according to 40 CFR 63.7540(a)(11), stated in SC IX.8.b, or five-year tune-up according to40 CFR 63.7540(a)(12), stated in SC IX.8.c. Include the date of the most recent burner inspection if it was not done annually, biennially, or on a five-year period and was delayed until the next scheduledor unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**

v. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii))**

12. The permittee must submit the reports according to the procedures specified in paragraph (h)(3) of 40 CFR 63.7550, as listed below. **(40 CFR 63.7550(h))**
    a) The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD. Instead of using the electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (*http://www.epa.gov/ttn/chief/cedri/index.html*), once the XML schema is available. If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90-days after the form becomes available in CEDRI.**(40 CFR 63.7550(h)(3))**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. 40 CFR Part 63, Subpart DDDDD applies to new or reconstructed affected sources as described in paragraph (a)(2) of 40 CFR 63.7490, as listed below. **(40 CFR 63.7490(a))**
    a) The affected source of 40 CFR Part 63, Subpart DDDDD is each new or reconstructed industrial, commercial, or institutional boiler or process heater, as defined in 40 CFR 63.7575, located at a major source. **(40 CFR 63.7490(a)(2))**

2. A boiler or process heater is:
    a) New if the permittee commences construction of the boiler or process heater after June 4, 2010, and the permittee meets the applicability criteria at the time the permittee commences construction.**(40 CFR 63.7490(b))**
    b) Reconstructed if the permittee meets the reconstruction criteria as defined in 40 CFR 63.2, the permittee commences reconstruction after June 4, 2010, and the permittee meets the applicability criteria at the time the permittee commence reconstruction. **(40 CFR 63.7490(c))**

3. If the permittee has a new or reconstructed boiler or process heater, the permittee must comply with 40 CFR Part 63, Subpart DDDDD by April 1, 2013, or upon startup of each boiler or process heater, whichever is later. **(40 CFR 63.7495(a))**

4. If the permittee has an area source that increases its emissions or its potential to emit such that it becomes a major source of HAP, paragraph (c)(2) of 40 CFR 63.7495, as listed below, applies to the permittee. **(40 CFR 63.7495(c))**
    a) Any new or reconstructed boiler or process heater at the existing source must be in compliance with this subpart upon startup. **(40 CFR 63.7495(c)(1))**

5. The permittee must be in compliance with the work practice standards of 40 CFR Part 63, Subpart DDDDD. **(40 CFR 63.7505(a))**

6. For affected sources, as defined in 40 CFR 63.7490, that switch subcategory consistent with 40 CFR 63.7545(h), stated in SC VII.8, after the initial compliance date, the permittee must demonstrate compliance within 60 days of the effective date of the switch, unless the compliance demonstration for this subcategory has been conducted within the previous 12 months. **(40 CFR 63.7510(k))**

7. For affected sources (as defined in 40 CFR 63.7490, stated in SC IX.1) that have not operated since the previous compliance demonstration and more than one year has passed since the previous compliance demonstration, the permittee must complete a subsequent tune-up by following the procedures described in 40 CFR 63.7540(a)(10)(i) through (vi), stated in SC IX.8.a, and the schedule described in40 CFR 63.7540(a)(13), stated in SC IX.8.d, for units that are not operating at the time of their scheduled tune-up. **(40 CFR 63.7515(g))**

8. The permittee must demonstrate continuous compliance with the work practice standards in Table 3 of 40 CFR Part 63, Subpart DDDDD that applies according to the methods specified in paragraphs (a)(10) through (13) of 40 CFR 63.7540, as listed below. **(40 CFR 63.7540(a))**
   a) If the boiler or process heater has a heat input capacity of 10 MMBtu per hour or greater, the permittee must conduct an annual tune-up of the boiler or process heater to demonstrate continuous compliance as specified in paragraphs (a)(10)(i) through (vi) of 40 CFR 63.7540, as listed below. The tune-up must be conducted while burning the type of fuel or fuels in case of units that routinely burn a mixture) that provided the majority of the heat input to the boiler or process heater over the 12-months prior to the tune-up. This frequency does not apply to units with continuous oxygen trim systems that maintain an optimum air to fuel ratio. **(40 CFR 63.7540(a)(10))**
      i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36-months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
      i. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
      ii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36-months from the previous inspection. **(40 CFR 63.7540(a)(10)(iii))**
      iii. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOx requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
      iv. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**
      v. Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (a)(10)(vi)(A) through (C) of 40 CFR 63.7540, as listed below. **(40 CFR 63.7540(a)(10)(vi))**
         (1) The concentrations of CO in the effluent stream in ppm by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
         (2) A description of any corrective actions taken as a part of the tune-up. **40 CFR 63.7540(a)(10)(vi)(B))**
         (3) The type and amount of fuel used over the 12-months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. **(40 CFR 63.7540(a)(10)(vi)(C))**

b) If the boiler or process heater has a heat input capacity of less than 10 MMBtu per hour (except as specified in paragraph (a)(12) of 40 CFR 63.7540), the permittee must conduct a biennial tune-up of the boiler or process heater as specified in paragraphs (a)(10)(i) through (vi) of 40 CFR 63.7540 to demonstrate continuous compliance. **(40 CFR 63.7540(a)(11))**

c) If the boiler or process heater has a continuous oxygen trim system that maintains an optimum air to fuel ratio, or a heat input capacity of less than or equal to 5 MMBtu per hour and the unit is in the units designed to burn gas 1 subcategory, the permittee must conduct a tune-up of the boiler or process heater every five-years as specified in paragraphs (a)(10)(i) through (vi) of 40 CFR 63.7540 to demonstrate continuous compliance. The permittee may delay the burner inspection specified in paragraph (a)(10)(i) of 40 CFR 63.7540 until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72-months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every five-years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. **(40 CFR 63.7540(a)(12))**

d) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30-calendar days of startup. (40 CFR 63.7540(a)(13))

9. Table 10 of 40 CFR Part 63, Subpart DDDDD shows which parts of the General Provisions in40 CFR 63.1 through 63.15 applies to the permittee. **(40 CFR 63.7565)**

Footnotes:

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

FGNGEMENG1
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Emergency engines subject to 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. New/Reconstructed emergency engines greater than 500 HP constructed on or after January 1, 2009.

Emission Unit: EUEMERGEN1, EUEMERGEN2.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NOx	2.0 g/HP-hr Or 160 ppmvd at 15% O_2	Hourly	Each EU in FGNGEMENG1	SC V.1, SC V.2, SC VI.2, SC VI.3	R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR 60.4233(e)
2. CO	4.0 g/HP-hr OR 540 ppmvd at 15% O_2	Hourly	Each EU in FGNGEMENG1	SC V.1, SC V.2, SC VI.2, SC VI.3	R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR 60.4233(e)
3. VOC	0.50 g/HP-hr[F,G]	Hourly	Each EU in FGNGEMENG1	SC V.1, SC V.2, SC VI.4	R 336.1205(1)(a) & (b), R 336.2908, 40 CFR 60.4233(e)

[F] For compliance purposes, this limit includes formaldehyde for Nonattainment New Source Review, but does not include formaldehyde for the NSPS.
[G] This emission limit has subsumed the emission limit required in 40 CFR 60 Subpart JJJJ, Table 1.

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in FGNGEMENG1. **(R 336.1205(1)(a), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), R 336.2908, 40 CFR 60.4233)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any EU in FGNGEMENG1 for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. The 500 hours includes the 100 hours as described in SC III.2. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**

2. The permittee may operate any EU in FGNGEMENG1 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 formaintenance 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 60.4243(d)(2))**

3. Each EU in FGNGEMENG1 may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as described in SC III.2. Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity. **(40 CFR 60.4243(d)(3)**

4. The permittee shall operate and maintain each EU in FGNGEMENG1 such that it meets the emission limits in SC I.1, I.2, and I.3 over the entire life of the engine. **(40 CFR 60.4234, 40 CFR 60.4243(b))**

5. If any EU in FGNGEMENG1 is operated as a certified engine, according to procedures specified in40 CFR Part 60, Subpart JJJJ, for the same model year, the permittee shall meet the following requirementsfor each respective engine:
   a) Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions,
   b) Meet the requirements as specified in 40 CFR 1068, Subparts A through D, as applicable, including labeling and maintaining certified engines according to the manufacture's recommendations.
   c) Only change those engine settings that are permitted by the manufacturer.

   If the permittee does not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine and be subject to SC III.6. **(40 CFR 60.4243(b)(1))**

6. If any EU in FGNGEMENG1 is a non-certified engine or a certified engine operating in a non-certified manner, per 40 CFR Part 60, Subpart JJJJ, the permittee shall keep a maintenance plan for each respective EU and shall, to the extent practicable, maintain and operate each respective EU in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4243(b)(2))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each EU in FGNGEMENG1 with a non-resettable hours meter to track the operating hours. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), R 336.2908, 40 CFR 52.21(c) & (d), 40 CFR 60.4237(a))**

2. The nameplate capacity of each EU in FGNGEMENG1 shall not exceed 850 HP, as certified by the equipment manufacturer. **(R 336.1205(1)(a) & (b), R 336.2908, 40 CFR 52.21(c) & (d))**

3. The emergency engines shall be 4-stroke rich-burn engines.[1] **(R 336.1225)**

V. TESTING/SAMPLING

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

1. If any EU in FGNGEMENG1 is a non-certified engine or a certified engine operating in a non-certified manner, per 40 CFR Part 60, Subpart JJJJ, the permittee must demonstrate compliance as follows:
   a) Conduct an initial performance test to demonstrate compliance with the applicable emission limits in SC I.1, I.2, and I.3 within 60 days after achieving the maximum production rate at which the respective EU will be operated, but not later than 180 days after initial startup of the respective EU, or within one year after the respective EU is no longer operated as a certified engine.
   b) The performance tests shall consist of three separate test runs of at least one hour, for each performance test required in 40 CFR 60.4244 and Table 2 to Subpart JJJJ of Part 60.
   c) Subsequent performance testing shall be completed every 8,760 hours of engine operation or every three years, whichever comes first, to demonstrate compliance with the applicable emission limits.

If a performance test is required, no less than 30 days prior to testing, a complete test plan shall be submitted to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of 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 336.1205(1)(a), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21 (c) & (d), 40 CFR 60.8, 40 CFR 60.4243, 40 CFR 60.4244, 40 CFR 60.4245, 40 CFR Part 60, Subpart JJJJ)**

2. Within 365 days after saleable vehicle production, the permittee shall conduct initial testing and, at least once every five years thereafter unless the permittee maintains a yearly demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify VOC mass emissions from representative EUs in FGNGEMENG1 by testing at owner's expense, in accordance with Department requirements. Alternatively, one EU may be tested if the permittee provides a demonstration to the AQD that the tested unit(s) is identical to and/or the emission rates from the tested unit(s) are representative of the other unit(s). Testing shall be performed using approved EPA Method(s) listed in

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

Alternate method(s), or a modification to the approved EPA Method(s), may be specified in an AQD-approved Test Protocol. 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. Verification of emission rates includes the submittal of 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 336.1205(1)(a) & (b), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2908)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep, in a satisfactory manner, the following records for each EU in FGNGEMENG1:
   a) If certified: The permittee shall keep records of the documentation from the manufacturer that the respective EU is certified to meet the emission standards and information as required in40 CFR Parts 90, 1048, 1054, and 1060, as applicable.
   b) If non-certified: The permittee shall keep records of testing required in SC V.1.

   The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1)(a), R 336.2908, 40 CFR 52.21(c) & (d), 40 CFR 60.4233(e), 40 CFR 60.4243, 40 CFR 60.4245(a))**

2. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for each EU in FGNGEMENG1:
   a) If certified: The permittee shall keep the manufacturer's emission-related written instructions and records demonstrating that the respective EU has been maintained according to them, as specified in SC III.5.
   b) If non-certified: The permittee shall keep records of a maintenance plan, as required by SC III.6 and records of conducted maintenance.

   The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4243, 40 CFR 60.4245(a), 40 CFR Part 60, Subpart JJJJ)**

3. The permittee shall monitor and record the total hours of operation for each EU in FGNGEMENEG1. The permittee shall document how many hours are spent for emergency operation of each EU in FGNGEMENG1 including what classified the operation as emergency. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), R 336.2908, 40 CFR 52.21(c) & (d), 40 CFR 60.4243, 40 CFR 60.4245(b))**

4. The permittee shall keep records of notifications submitted for the completion of construction and start-up of each EU in FGNGEMENG1. **(40 CFR 60.4245(a))**

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 commencement of trial operation of each EU in FGNGEMENG1. **(R 336.1216(1)(a)(v), R 336.1201(7)(a))**~~

~~2.~~1. The permittee shall submit a notification specifying whether each EU in FGNGEMENG will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of each EU in FGNGEMENG1 and within 30 days of switching the manner of operation.**(40 CFR Part 60, Subpart JJJJ)**

~~3.~~2. If any EU in FGNGEMENG1 has not been certified by an engine manufacturer to meet the emission standards in 40 CFR 60.4231, the permittee shall submit an initial notification as required in 40 CFR 60.7(a)(1). The notification must include the following information:

a) The date construction of the respective EU commenced.
b) Name and address of the owner or operator.
c) The address of the affected source.
d) The respective EU information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement.
e) The respective EU emission control equipment.
f) Fuel used in the respective EU.

The notification must be postmarked no later than 30 days after construction commenced for the respective EU. **(40 CFR 60.7(a)(1), 40 CFR 60.4245(c))**

~~4.~~3. The permittee shall submit an initial notification as required in 40 CFR 63.6645(f) for each EU in FGNGEMENG1. The notification must include the information in 40 CFR 63.9(b)(2)(i)-(v):

a) The name and address of the owner or operator.
b) The address (i.e., physical location) of the affected source.
c) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date.
d) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted.
e) A statement of whether the affected source is a major source or an area source.

The notification must also include a statement that each EU in FGNGEMENG1 has no additional requirements and explain the basis of the exclusion (for example, that it operates exclusively as an emergency stationary RICE if it has a site rating of more than 500 brake HP located at a major source of HAP emissions). **(40 CFR 63.9(b)(2)(i)-(v), 40 CFR 63.6590(b)(1), 40 CFR 63.6645(f))**

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. SVGEN1	7.5	10	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVGEN2	7.5	10	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart JJJJ, as they apply to FGNGEMENG1. **(40 CFR Part 60, Subparts A & JJJJ)**

2. The permittee shall comply with the provisions of the federal National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, as they apply to FGNGEMENG1. **(40 CFR Part 63, Subparts A & ZZZZ)**

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

FGNGEMENG2
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Emergency engines subject to 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. New/Reconstructed emergency engines less than 500 HP constructed on or after January 1, 2009.

Emission Unit: EUEMERGEN3, EUEMERGEN4.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NOx	2.0 g/HP-hr Or 160 ppmvd at 15% O_2	Hourly	Each EU in FGNGEMENG2	SC V.1, SC V.2, SC VI.2, SC VI.3	R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR 60.4233(e)
2. CO	4.0 g/HP-hr OR 540 ppmvd at 15% O_2	Hourly	Each EU in FGNGEMENG2	SC V.1, SC V.2, SC VI.2, SC VI.3	R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR 60.4233(e)
3. VOC	1.0 g/HP-hr[F,G]	Hourly	Each EU in FGNGEMENG2	SC V.1, SC V.2, SC VI.4	R 336.1205(1)(a) & (b), R 336.2908, 40 CFR 60.4233(e)

[F] For compliance purposes, this limit includes formaldehyde for Nonattainment New Source Review, but does not include formaldehyde for the NSPS.
[G] This emission limit has subsumed the emission limit required in 40 CFR 60 Subpart JJJJ, Table 1.

II. MATERIAL LIMIT(S)

1. The permittee shall burn only pipeline quality natural gas in FGNGEMENG2. **(R 336.1205(1)(a), R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d), R 336.2908, 40 CFR 60.4233)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any EU in FGNGEMENG2 for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. The 500 hours includes the 100 hours as described in SC III.2. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**

2. The permittee may operate any EU in FGNGEMENG2 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 formaintenance 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 60.4243(d)(2))**

3. Each EU in FGNGEMENG2 may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing as described in SC III.2. Except as provided in 40 CFR 60.4243(d)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity. **(40 CFR 60.4243(d)(3)**

4. The permittee shall operate and maintain each EU in FGNGEMENG2 such that it meets the emission limits in SC I.1, I.2, and I.3 over the entire life of the engine. **(40 CFR 60.4234, 40 CFR 60.4243(b))**

5. If any EU in FGNGEMENG2 is operated as a certified engine, according to procedures specified in40 CFR Part 60, Subpart JJJJ, for the same model year, the permittee shall meet the following requirementsfor each respective engine:
   a) Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions,
   b) Meet the requirements as specified in 40 CFR 1068, Subparts A through D, as applicable, including labeling and maintaining certified engines according to the manufacture's recommendations,
   c) Only change those engine settings that are permitted by the manufacturer.

   If the permittee does not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine will be considered a non-certified engine and be subject to SC III.6. **(40 CFR 60.4243(b)(1))**

6. If any EU in FGNGEMENG2 is a non-certified engine or a certified engine operating in a non-certified manner, per 40 CFR Part 60, Subpart JJJJ, the permittee shall keep a maintenance plan for each respective EU and shall, to the extent practicable, maintain and operate each respective EU in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4243(b)(2))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each EU in FGNGEMENG2 with a non-resettable hours meter to track the operating hours. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), R 336.2908, 40 CFR 52.21(c) & (d), 40 CFR 60.4237(a))**

2. The nameplate capacity of each EU in FGNGEMENG2 shall not exceed 350 HP, as certified by the equipment manufacturer. **(R 336.1205(1)(a) & (b), R 336.2908, 40 CFR 52.21(c) & (d), 40 CFR 60.4230)**

3. The emergency engines shall be 4-stroke rich-burn engines.[1] **(R 336.1225)**

V. TESTING/SAMPLING

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

1. If any EU in FGNGEMENG2 is a non-certified engine or a certified engine operating in a non-certified manner, per 40 CFR Part 60, Subpart JJJJ, the permittee must demonstrate compliance as follows:
   a) Conduct an initial performance test to demonstrate compliance with the applicable emission limits in SC I.1, I.2, and I.3 within 60 days after achieving the maximum production rate at which the respective EU will be operated, but not later than 180 days after initial startup of the respective EU, or within one year after the respective EU is no longer operated as a certified engine.
   b) The performance tests shall consist of three separate test runs of at least one hour, for each performance test required in 40 CFR 60.4244 and Table 2 to Subpart JJJJ of Part 60.
   c) Subsequent performance testing shall be completed every 8,760 hours of engine operation or every three years, whichever comes first, to demonstrate compliance with the applicable emission limits.

If a performance test is required, no less than 30 days prior to testing, a complete test plan shall be submitted to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of 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 336.1205(1)(a), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21 (c) & (d), 40 CFR 60.8, 40 CFR 60.4243, 40 CFR 60.4244, 40 CFR 60.4245, 40 CFR Part 60, Subpart JJJJ)**

2. Within 365 days after saleable vehicle production, the permittee shall conduct initial testing and, at least once every five years thereafter unless the permittee documents annually that the most recent acceptable test remains valid and representative, the permittee shall verify VOC mass emissions from representative EUs in FGNGEMENG2 by testing at owner's expense, in accordance with Department requirements. Alternatively, one EU may be tested if the permittee provides a demonstration to the AQD that the tested unit(s) is identical to and/or the emission rates from the tested unit(s) are representative of the other unit(s). Testing shall be performed using approved EPA Method(s) listed in

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

Alternate method(s), or a modification to the approved EPA Method(s), may be specified in an AQD-approved Test Protocol. 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. Verification of emission rates includes the submittal of 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 336.1205(1)(a) & (b), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2908)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep, in a satisfactory manner, the following records for each EU in FGNGEMENG2:
   a) If certified: The permittee shall keep records of the documentation from the manufacturer that the respective EU is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable.
   b) If non-certified: The permittee shall keep records of testing required in SC V.1.

   The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1)(a), R 336.2908, 40 CFR 52.21(c) & (d), 40 CFR 60.4233(e), 40 CFR 60.4243, 40 CFR 60.4245(a))**

2. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for each EU in FGNGEMENG2:
   a) If certified: The permittee shall keep the manufacturer's emission-related written instructions and records demonstrating that the respective EU has been maintained according to them, as specified in SC III.5.
   b) If non-certified: The permittee shall keep records of a maintenance plan, as required by SC III.6 and records of conducted maintenance.

   The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4243, 40 CFR 60.4245(a), 40 CFR Part 60, Subpart JJJJ)**

3. The permittee shall monitor and record the total hours of operation for each EU in FGNGEMENEG. The permittee shall document how many hours are spent for emergency operation of each EU in FGNGEMENG2 including what classified the operation as emergency. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), R 336.2908, 40 CFR 52.21(c) & (d), 40 CFR 60.4243, 40 CFR 60.4245(b))**

4. The permittee shall keep records of notifications submitted for the completion of construction and start-up of each EU in FGNGEMENG2. **(40 CFR 60.4245(a))**

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 commencement of trial operation of each EU in FGNGEMENG2.~~ **~~(R 336.1201(7)(a))~~**

~~2.~~1. The permittee shall submit a notification specifying whether each EU in FGNGEMENG2 will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of each EU in FGNGEMENG2 and within 30 days of switching the manner of operation.**(40 CFR Part 60, Subpart JJJJ)**

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. SVGEN3	7.5	10	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVGEN4	7.5	10	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart JJJJ, as they apply to FGNGEMENG2. **(40 CFR Part 60, Subparts A & JJJJ, 40 CFR 63.6590)**

2. The permittee shall comply with the provisions of the federal National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, as they apply to FGNGEMENG2. In accordance with 40 CFR 63.6590(c)(6), anew or reconstructed emergency stationary RICE with a site rating of less than or equal to 500 HP located at a major source of HAP emissions meets the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ. **(40 CFR Part 63 Subparts A & ZZZZ, 40 CFR 63.6590)**

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

FGFIREPUMP
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two (2) 350 HP diesel -fired emergency fire pumps with model years of 2011 or later and a displacement of <30 liters/cylinder.

Emission Unit: EUFIREPUMP1, EUFIREPUMP2.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NMHC[H]+NOx	3.0 g/bhp-hr[I]	Hourly	Each EU in FGFIREPUMP	SC V.1, SC V.2, SC VI.2, SC VI.3	40 CFR 60.4205(c), Table 4 of 40 CFR Part 60, Subpart IIII
2. CO	2.6 g/bhp-hr[I]	Hourly	Each EU in FGFIREPUMP	SC V.1, SC V.2, SC VI.2, SC VI.3	40 CFR 60.4205(c), Table 4 of 40 CFR Part 60, Subpart IIII
3. PM	0.15 g/bhp-hr[I]	Hourly	Each EU in FGFIREPUMP	SC V.1, SC V.2, SC VI.2, SC VI.3	R336.1205(1)(a) & (b), R 336.1331(1)(c), 40 CFR 60.4205(c), Table 4 of 40 CFR Part 60, Subpart IIII
4. VOC	0.10 g/bhp-hr	Hourly	Each EU in FGFIREPUMP	SC V.2, SC VI.4	R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2908

[H] NMHC = nonmethane hydrocarbon
[I] These emission limits are for certified engines; if testing becomes required to demonstrate compliance, then the tested values must be compared to the Not to Exceed (NTE) requirements determined through 40 CFR 60.4212(c).

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in FGFIREPUMP with a maximum sulfur content of 15 ppm (0.0015 percent) by weight, and a minimum cetane index of 40 or a maximum aromatic content of 35 volumepercent. **(R 336.1205(1)(a) & (b), 40 CFR 60.4207(b), 40 CFR 80.510(b))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate any EU in FGFIREPUMP for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. The 500 hours includes the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.2.**(R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2908, 40 CFR 52.21(c) & (d))**

2. The permittee may operate each EU in FGFIREPUMP 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 formaintenance 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. Each EU in FGFIREPUMP may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency poweras part of a financial arrangement with another entity. **(40 CFR 60.4211(f))**

3. If the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60, Subpart IIII, for the same model year and maximum engine power, the permittee shall meet the following requirements for each respective EU in FGFIREPUMP:
   a) Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions.
   b) Change only those emission-related settings that are permitted by the manufacturer.
   c) Meet the requirements as specified in 40 CFR 89, 94, and/or 1068, as they apply to each respective EU in FGFIREPUMP.

   If the permittee does not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine may be considered a non-certified engine. **(40 CFR 60.4211(a) & (c), R 336.2908)**

4. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for each respective EU in FGFIREPUMP and shall, to the extent practicable, maintain and operate engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4211(g)(2), R 336.2908)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each EU in FGFIREPUMP with a non-resettable hours meter to track the operating hours. **(R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2908,40 CFR 52.21(c) & (d), 40 CFR 60.4209(a))**

2. The maximum NFPA nameplate engine power of each EU in FGFIREPUMP shall not exceed 350 brake HP. **(R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2908, Table 4 of 40 CFR Part 60, Subpart IIII)**

V. TESTING/SAMPLING

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

1. If any EU in FGFIREPUMP is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:
   a) Conduct an initial performance test to demonstrate compliance with the applicable emission standards within one year of startup, or within one year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within one year after you change emission-related settings in a way that is not permitted by the manufacturer.
   b) If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212.

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. **(40 CFR 60.4211(g)(2), 40 CFR 60.4212)**

2. Within 365 days after saleable vehicle production, the permittee shall conduct initial testing and, at least once every five years thereafter unless the permittee maintains a yearly demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify VOC mass emissions from all EUs in FGFIREPUMP by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
VOC	40 CFR Part 60, Appendix A, 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. 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. Verification of emission rates includes the submittal of 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 336.1205(1)(a) & (b), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2908, 40 CFR 52.21(c) & (d))**

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 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.908, 40 CFR 60.4211, 40 CFR 60.4214)**

2. The permittee shall keep, in a satisfactory manner, the following records for each EU in FGFIREPUMP:
   a) For certified engine: The permittee shall keep records of the manufacturer certification documentation.
   b) For uncertified engine: The permittee shall keep records of testing required in SC V.1.

   The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4211)**

3. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for each EU in FGFIREPUMP:
   a) For certified engine: The permittee shall keep records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as specified in SC III.3.
   b) For uncertified engine: The permittee shall keep records of a maintenance plan, as required by SC III.4, and maintenance activities.

   The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4211)**

4. The permittee shall keep, in a satisfactory manner, test reports for each EU in FGFIREPUMP required by SC V.2 and SC V.3 on file at the facility. The permittee shall make the records available to the Department upon request. **(R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2908)**

5. The permittee shall monitor and record the total hours of operation and the hours of operation during non-emergencies for each EU in FGFIREPUMP, on a monthly and 12-month rolling time period basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation of each EU in FGFIREPUMP, including what classified the operation as emergency. **(R 336.1205(1)(a) & (b), R 336.1225, R 336.1702(a), R 336.2908, 40 CFR 60.4211, 40 CFR 60.4214)**

6. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in each EU in FGFIREPUMP, demonstrating that the fuel meets the requirement of 40 CFR 80.510(b), as specified in SC II.1. 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. **(R 336.1205(1)(a) & (b), 40 CFR 52.21(c) & (d), 40 CFR 60.4207(b), 40 CFR 80.510(b))**

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 commencement of trial operation of each EU in FGFIREPUMP. **(R 336.1201(7)(a))**~~

~~2.~~1. The permittee shall submit a notification specifying whether each EU in FGFIREPUMP will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation. **(R 336.1201(3))**

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. SVPUMP1	7.5	15	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVPUMP2	7.5	15	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart IIII, as they apply to each EU in FGFIREPUMP. **(40 CFR Part 60, Subparts A & IIII, 40 CFR 63.6590)**

2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, as they apply to each EU in FGFIREPUMP. In accordance with 40 CFR 63.6590(c)(6), a new or reconstructed emergency stationary RICE with a site rating of less than or equal to 500 HP located at a major source of HAP emissions meets the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII. **(40 CFR Part 63 Subparts A and ZZZZ, 40 CFR 63.6590)**

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

FGFUEL
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All gasoline storage tanks containing fuel for vehicle fuel filling operations. Vehicles being filled with gasoline shall be equipped with on-board refueling vapor recovery (ORVR).

Emission Unit: EUFUELFILL, EUGASTANK1, EUGASTANK2.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not add gasoline to any vehicle without an Onboard Re-fueling Vapor Recovery (ORVR) system. **(R336.1225, R 336.1702(a), R336.1910, R 336.2908)**

2. The permittee shall not load or allow the loading of gasoline from a delivery vessel into any new stationary vessel of more than 2,000 gallons (7.57 cubic meters or 7,571 liters) capacity unless such stationary vessel is equipped with a permanent submerged fill pipe. **(R 336.1703(1), R 336.2908)**

3. The permittee shall not load or allow the loading of gasoline from a delivery vessel into any new stationary vessel of more than 2,000 gallons (7.57 cubic meters or 7,571 liters) capacity unless such stationary vessel is equipped with a vapor balance system or an equivalent control system approved by the Department. The vapor balance system shall capture displaced gasoline vapor and air via a vaportight collection line and shall be designed to return not less than 90 percent by weight of the displaced gasoline vapor from the stationary vessel to the delivery vessel. The respective stationary vessels shall be equipped, maintained, or controlled with the following: **(R 336.1703(2), R 336.2908)**
   a) An interlocking system or procedure to ensure that the vaportight collection line is connected before any gasoline can be loaded.
   b) A device to ensure that the vaportight collection line shall close upon disconnection so as to prevent release of gasoline vapor.

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material introduced to the storage tanks in FGFUEL, including the weight percent of each component. 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 336.1225, R 336.1702)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

FGNGEQUIP
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

All natural gas-fired equipment in the paint shop portion of the Detroit Assembly Complex Mack Plant, except the four emergency generators, including air supply houses, space heaters, heated flash, cure ovens, the carbon concentrator, and the RTO, and Air Handling Units/Air Supply Houses installed at the Mack1&2 building. The natural gas equipment at the Mack1&2 building has a total heat input capacity of 74.7 MMBtu/hr.

Emission Unit: EUECOAT, EUSLR/ADH/DEAD, EUPRIMER, EUTOPCOAT, EUASH/ASH/SH, EUNEWNGMACK1&2, EUHWG1, EUHWG2, EUHWG3, EUHWG4, EUHWG5, EUHWG6, EUHWG7, EUHWG8, EUHWG9.

POLLUTION CONTROL EQUIPMENT

Low NOx burners on all equipment, RTO for VOC control of spray booths and curing ovens in EUECOAT, EUPRIMER, and EUTOPCOAT, dry filter particulate controls on direct-fired natural gas equipment.

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall burn only pipeline quality natural gas in FGNGEQUIP **(R 336.1205, R 336.1224,R 336.1225, R 336.1702(a), R 336.2908, 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FGNEQUIP unless Low NOx burners are installed, maintained, and operated in a satisfactory manner. **(R 336.1205, R 336.1225, 40 CFR 52.21(c) & (d))**

2. The permittee shall not operate any air handling units, any air supply houses, and any curing ovens in EUECOAT, EUPRIMER, and EUTOPCOAT in FGNGEQUIP unless the respective dry filter particulate control systems are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the dry filter control system includes conducting the required monitoring and recordkeeping pursuant to FGAUTOASSEMBLY, SC VI.2. **(R 336.1205(1)(a) & (3), R 336.1331, 40 CFR 52.21(c) & (d))**

3. All air supply houses, air handling units, and E-coat, primer, and topcoat oven(s) in FGNGEQUIP shall be direct-fired units. **(R 336.1205, R 336.1225, 40 CFR 52.21(c) & (d))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

1. Within 60 days of start-up, the permittee shall provide information acceptable to the AQD District Supervisor demonstrating the Hot Water Generators (HWG), the air supply houses, and the space heaters are equipped with Low NOx burners. **(R 336.1205(1)(a) & (3))**

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. SVBOOTHCONC	94	130	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVRTO	76	130	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVHWG1*	14	15	R 336.1225, 40 CFR 52.21(c) & (d)
4. SVHWG2*	14	15	R 336.1225, 40 CFR 52.21(c) & (d)
5. SVHWG3*	14	15	R 336.1225, 40 CFR 52.21(c) & (d)
6. SVHWG4*	14	15	R 336.1225, 40 CFR 52.21(c) & (d)
7. SVHWG5*	14	15	R 336.1225, 40 CFR 52.21(c) & (d)
8. SVHWG6*	14	90	R 336.1225, 40 CFR 52.21(c) & (d)
9. SVHWG7*	14	90	R 336.1225, 40 CFR 52.21(c) & (d)
10. SVHWG8*	14	90	R 336.1225, 40 CFR 52.21(c) & (d)
11. SVHWG9*	14	90	R 336.1225, 40 CFR 52.21(c) & (d)
12. SVPRMHT1	12	120	R 336.1225, 40 CFR 52.21(c) & (d)
13. SVPRMHT2	12	120	R 336.1225, 40 CFR 52.21(c) & (d)
14. SVC1OVHT	10	120	R 336.1225, 40 CFR 52.21(c) & (d)
15. SVC2OVHT	10	120	R 336.1225, 40 CFR 52.21(c) & (d)
*These stacks are horizontal			

IX. OTHER REQUIREMENT(S)

1. Within 30 days of installation, the permittee shall label all natural gas equipment with its respective EU and/or FG name in a manner acceptable to the AQD District Supervisor. **(R 336.1205)**

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

FGTANKS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EUGASTANK1, EUGASTANK2, EUCOOLANTTANK, EUMETANK1, EUMETANK2.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702)**

2. The permittee shall keep a record of the following for each storage vessel:
   a) The identification (name, tank #, etc.).
   b) Location within the plant.
   c) The capacity of the vessel.
   d) The date of installation / modification.
   e) The type of material contained in the vessel.
   f) The true vapor pressure of the material contained in the vessel at actual storage conditions.
   g) The applicable requirements.

   The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1703, 40 CFR 60, Subparts K, Ka, Kb)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. Any new gasoline tank (placed into operation on or after 07/01/79) shall comply with the applicable requirements of Rule 703. **(R 336.1703)**

2. Any gasoline tank or volatile organic liquid (VOL) storage tank shall comply with New Source Performance Standards, 40 CFR Part 60, Subparts A, K, Ka, Kb based upon installation or modification date and applicability and designation of affected facility provisions in 40 CFR 60.110, 60.110a, 60.110b. Construction, reconstruction, or modification dates are as follows: **(40 CFR Part 60, Subparts A, K, Ka, Kb)**
   a) Subpart K: after June 11, 1973 and prior to May 19,1978.
   b) Subpart Ka: after May 18,1978 and prior to July 23, 1984.
   c) Subpart Kb: after July 23, 1984.

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

FGOLD
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The affected source is each new, reconstructed, or existing Organic Liquid Distribution (OLD) (non-gasoline) operation that is located at, or is part of, a major source of hazardous air pollutant (HAP) emissions. The affected source is comprised of storage tanks, transfer racks, equipment leak components associated with storage tanks, transfer racks and pipelines, transport vehicles, and all containers while loading or unloading at transfer racks subject to this subpart. Equipment that is part of an affected source under another NESHAP is excluded from the affected source. **(40 CFR 63.2338(c))**

These conditions specifically cover existing (construction pre dates April 2, 2002) liquid storage tanks which hold more than 5,000 gallons but less than 50,000 gallons and/or new liquid storage tanks which hold more than 5,000 gallons but less than 10,000 gallons of methanol/windshield washer fill solvents that are dispensed to newly assembled vehicles.

Emission Units: EUMETANK1, EUMETANK2.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. For each existing storage tank with a capacity greater than 5,000 gallons but less than 50,000 gallons, the permittee shall comply with the requirements of 63.2343(b). **(40 CFR 63.2343(b))**

2. For each new storage tank with a capacity greater than 5,000 gallons but less than 10,000 gallons, the permittee shall comply with the requirements of 63.2343(b). **(40 CFR 63.2343(b))**

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))**

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep documentation, including a record of the annual average true vapor pressure of the total Table 1 Organic liquid, which verifies the storage tank is not required to be controlled under this subpart. The documentation shall be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review. **(40 CFR 63.2343(b)(3))**

VII. REPORTING

1. The permittee shall submit the following information in either the Notification of Compliance Status, according to the schedule in Table 12 to this subpart, or in your first Compliance report according to the schedule in 63.2386(b), whichever occurs first. **(40 CFR 63.2343(b)(1))**
   a) Company name and address.
   b) A statement by a responsible official, including the official's name, title and signature, certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete.
   c) Date of report and beginning and ending dates of the reporting period.
   d) A list of all storage tanks greater than 5,000 gallons that are part of the affected source but not subject to any of the emission limitations, operating limits, or work practice standards of this subpart.

2. The permittee shall submit subsequent compliance reports according to the schedule in 63.2386(b) or in conjunction with the reporting requirements in this permit whenever any of the following events occur as applicable: **(40 CFR 63.2343(b)(2))**
   a) Any storage tank became subject to control under this subpart EEEE.
   b) Any storage tank greater than 5,000 gallons became part of the affected source, but is not subject to any emission limitations, operating limits or work practice standards of this subpart.

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

FG- FIREPUMP-EXIST
FLEXIBLE GROUP CONDITIONS

DESCRIPTION:

One (1) diesel fueled fire pump (compression ignition [CI]) subject to 40 CFR 63 Subpart ZZZZ, NESHAP for Reciprocating Internal Combustion Engines (RICE).

Compliance date – May 3, 2013 for CI Engines

Emission Units: EUFIREPUMP3

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate and maintain any affected CI RICE, 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 you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used 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 63.6605(b))**

2. The permittee shall comply with the following requirements, except during periods of startup: **(40 CFR 63.6603(a))**

   For CI Engines: (40 CFR 63.6603(a), Table 2d item 4)
   a) Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.4.
   b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
   c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

3. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop you own 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 63.6625(e), 40 CFR 63.6640(a) , Table 6 item 9)**

4. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in 40 CFR 63.6603(a) and as listed in SC III.2. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the parameters and keep records as required in 63.6625(i). **(40 CFR 63.6625(i))**

5. The permittee shall not allow the engine(s) to exceed 100 hours for maintenance checks and readiness testing. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but 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 RICE beyond 100 hours per year. **(40 CFR 63.6640(f)(ii))**

6. The permittee shall not allow the engine(s) to operate more than 50 hours per year for non-emergency situations, as allowed in 40 CFR 63.6640(f)(iii). **(40 CFR 63.6640(f)(iii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. If using the oil analysis program for CI Engine(s), the permittee shall test for Total Base Number, viscosity and percent water content. **(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. Must install a non-resettable hour meter if one is not already installed. **(40 CFR 63.6625(f))**

2. The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. **(40 CFR 63.6655(f))**

3. The permittee must 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. **(40 CFR 63.6655(f))**

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))**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. Permittee shall comply with all applicable provisions of the RICE MACT as specified in 40 CFR 63 Subpart ZZZZ. **(40 CFR 63 Subpart ZZZZ)**

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).

FG-HEATERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION:

Existing air handling units from former engine manufacturing plant, burning natural gas fuel.

Emission Units: EUHEATERS

POLLUTION CONTROL EQUIPMENT

NA

X. EMISSION LIMIT(S)

NA

XI. MATERIAL LIMIT(S)

NA

XII. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall burn only pipeline quality natural gas in FG-HEATERS. **(R 336.1205, R 336.1224,R 336.1225, R 336.1702(a), R 336.2908, 40 CFR 52.21(c) & (d))**

XIII. DESIGN/EQUIPMENT PARAMETER(S)

NA

XIV. TESTING/SAMPLING

NA

XV. MONITORING/RECORDKEEPING

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

XVI. REPORTING

NA

XVII. STACK/VENT RESTRICTION(S)

NA

XVIII. OTHER REQUIREMENT(S)

NA

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

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: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-MAP

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Attached is DACM's Malfunction Abatement Plan (MAP).

Page 1 of 1

FCA US LLC
Detroit Assembly Complex - Mack

Permit No.: Permit to Install 14-19A

Malfunction Abatement Plan

TABLE OF CONTENTS

1.0 Purpose and Use

This Malfunction Abatement Plan was developed in accordance with Michigan Department of Environmental Quality R336.1911, Permit to Install 14-19A for the regenerative thermal oxidizers, concentrator, water wash systems and dry particulate control devices used to control emissions from the Electrocoat and Paint process at FCA Detroit Assembly Complex - Mack (DACM). The purpose of the malfunction and abatement plan is to prevent, detect and correct malfunctions or equipment failures that may result in volatile organic compound (VOC) or particulate matter (PM) emissions exceeding any applicable emission limitation.

This plan includes a description of the following elements, consistent with the requirements established in state regulations (Michigan Air Pollution Control Rules, R336.1911) for malfunction abatement plans:

- The preventive maintenance program for the pollution control equipment;
- The operating variables that are monitored to detect a malfunction; and
- A description of corrective maintenance procedures and/or operational changes to be made in the event of a malfunction.

2.0 Applicability and Control Device List

This plan applies to the regenerative thermal oxidizer (RTO), concentrators, water wash system, and dry particulate filter systems at DACM. The sources and applicable air pollution control equipment are defined in Table 1 for the Paint Shop at DACM.

Table 1
Paint Shop List of Sources and Air Pollution Control Equipment

Emission Unit	Potential Air Pollutant	Applicable Air Pollutant Control Equipment
Electrocoat tank and ovens, primer ovens, topcoat ovens	VOC	Direct to RTO
Primer/topcoat/clearcoat coating booth, heated flash-off areas	PM and VOC	Dry Filters, Concentrator and RTO
Primer/topcoat/clearcoat booth overspray	PM	Water Wash System
Prep booth, flash prime booth, color prep, heavy reprocess, observation zone, spot repair, final repair	PM	Dry Filters

3.0 Preventive Maintenance Program

This section describes the procedures for maintaining the regenerative thermal oxidizers, concentrator, dry filter and water wash systems. It also identifies the frequency of inspection, the activities undertaken, and the personnel responsible for overseeing the inspection, maintenance and repair of this equipment.

3.1 Preventive Maintenance Activities

The preventive maintenance activities for the regenerative thermal oxidizer were established using the manufacturer's recommended general and preventive maintenance procedures, operational and maintenance experience with the regenerative thermal oxidizer as well as sound engineering practice in accordance with industry standards.

The maintenance and inspection activities records are maintained electronically in the plant's Total Maintenance System (TMS). Table 3 summarizes the preventive maintenance activities and associated frequencies.

Table 3
Summary of Preventive Maintenance Activities

Frequency	Preventive Maintenance Activity
Regenerative Thermal Oxidizer & Concentrators	
Monthly	• Inspect burner concentrator heater • Inspect valve proving device • Combustion air filter cleaning and replacement • Flushing fan drive inspection • RTO burner inspection • Damper flange bearing inspection
Every 2 Months	Fan shaft inspection
Semi-Annually	• Inspect fan vibration switch • Fan shaft coupling inspection • Hydraulic power unit air breather replacement • Hydraulic power unit oil inspection

Frequency	Preventive Maintenance Activity
Regenerative Thermal Oxidizer & Concentrators	
Annually	• Differential pressure switch replacement • Replace valve motor actuator • Replace gas motor regulator • Replace pilot solenoid valve • Replace Hi-Lo limit assembly • Recalibration and/or replacement of each thermocouple • Replace butterfly valve • Blocking valve replacement • Perform an inspection of the valve seals condition and verify valve timing/synchronization (min every 18 months) • Lubricate fan bearing • Inspect fan bearing RTD • Replace grease cartridge • Concentrator gearbox oil lubrication • Flushing fan belt replacement • Pressure transmitter service • Hydraulic power unit reservoir inspection
Every Two Years	• Replace concentrator drive belt
Every Four Years	• Replace damper proximity switch • Damper gland packing replacement
Every Five Years	• Flushing fan bushing replacement
As Needed	• Replace burner transformer • Replace fan motor • Replace concentrator drive and motor • Replace damper actuator • Replace limit switch • Can damper seal replacement • Burner air pressure switch replacement • Hydraulic power unit heater replacement • Hydraulic power unit level switch replacement • Engaging tower degrade mode (test) • Damper hydraulic flow control replacement
Dry Particulate Filters	
Weekly	• Inspection of Dry Particulate Filters (replaced as necessary)
Water Wash Systems	
Weekly	• Inspection of Water Wash System
Annually	• Water Wash Replacement

A list of the major replacement parts for the regenerative thermal oxidizer and concentrator systems that are inventoried, used and periodically re-stocked is provided in Table 4 and Table 5, respectively. DACM also maintains an inventory of dry filters used in the particulate matter control systems in the facility

Table 4
Major RTO Replacement Parts

Pressure Transmitter
Fan Bearing Temperature Thermocouples
Flushing Fan belts
Ignitors
Gaskets
Flushing Fan Motor
Thermocouples

Table 5
Major Concentrator Replacement Parts

Pressure gauges
Limit Switch
Rotation Drive Motor
Rotor Seals
Thermocouples
Drive Belt
Pulsation Damper

3.2 Preventive Maintenance Responsible Personnel

The following personnel share responsibility for ensuring that the inspection and maintenance activities for the regenerative thermal oxidizer, concentrator, water wash and dry filters are completed:

- Paint Shop Maintenance Manager
- Maintenance Area Manager
- Facility Engineers
- Millwrights, Pipefitters and Electricians

4.0 Operating Parameter Monitoring and Malfunction Detection

RTO and Concentrators The RTO and Concentrators are the pollution control devices for E-Coat tank and ovens, spray booths and their ovens. Their normal operating conditions are defined in terms of monitoring the following parameters:

- The operating temperature is established during regulatory testing for Destruction Efficiency.
- The temperature is electronically recorded every 15mins in DACM FIS
- No by-pass valve or stack dampers are open to the atmosphere during production
- In the event the DACM FIS data logger goes offline, operators manually record the data every 15 minutes as a back up
- If the operating temperature drops below the set point, the conveyor system leading into the spray booths and/or the Ecoat system are interlocked thus preventing vehicles from proceeding into the emission source.
- The spray booths, ovens and Ecoat system are stripped of any vehicles already in the system prior to the incident that engaged the interlock.

Dry Filters and Water Wash
The dry filters are inspected and evaluated weekly, and replaced on a regular basis as needed. The water wash system is inspected weekly to assess proper operation.

5.0 Malfunction Operating Scenarios

Permit conditions, requires the RTO and concentrator be operated at certain temperatures to achieve a minimum VOC destruction efficiency during production hours. A reportable malfunction occurs when the RTO/TO/concentrator malfunction results in excess emissions, as defined in the permit and Michigan Air Pollution Control rules.

In the event the RTO operating temperature or the concentrator desorb inlet temperature fall below the set point during production or just prior to production startup, the production stop interlock is activated in various entrance stage of the processes as listed below:

- Prior to tack off zone for all Spray booths and Ovens
- Pretreatment/Phosphate Pre-cleaning stage for the Ecoat system

Vehicles stranded within the process prior the incident are stripped out and production do not resume until the corresponding operating/desorb temperature is back to the appropriate set point.

The Paint Maintenance manager, through each shift's Paint Maintenance Supervisor, is responsible for maintaining the RTO in accordance with all Federal and Michigan State rules and permit conditions.

It is responsibility of the Paint Maintenance Manager and Paint Maintenance Supervisors to notify the EH&S Environmental Specialist if RTO/concentrator drops below normal operating temperature or if the interlock is engaged. During any incident of control equipment malfunction, the Paint Maintenance Manager, Paint Maintenance Supervisors and EHS staff will coordinate efforts to minimize emissions.

Any misplacement of, or problems with, the particulate matter dry filter or the water wash systems will be identified by the inspector during their weekly inspections and be expeditiously reported to EHS staff.

EHS staff is responsible for evaluating emissions during a malfunction to determine if emissions were in excess of any permit limit.

The Environmental Specialist will notify the Michigan Department of Environment, Great Lakes & Energy (EGLE) of a reportable malfunction as required pursuant to Michigan Rule R336.1912 and PTI # 14-19A.

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

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: N2155	Section Number (if applicable): 2

1. Additional Information ID
AI-DACM-CAM

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Attached is DACM's Compliance Assurance Monitoring (CAM) plan.

Page 1 of 1

FCA US LLC, Detroit Assembly Complex - Mack

Compliance Assurance Monitoring (CAM) Plan

I. BACKGROUND

FCA US LLC Detroit Assembly Complex - Mack ("DACM") is located at 4000 St. Jean, Detroit Wayne County, Michigan. The facility consists of an automobile and light duty truck manufacturing plant. DACM is considered a major source of VOCs and currently relies on VOC emission control devices that operate in accordance with the maintenance and inspection requirements noted in FG-Controls of the current PTI (which are conditions anticipated to become CAM requirements upon issuance of an applicable ROP). CAM requirements will be applicable to the Regenerative Thermal Oxidizer and concentrators that abate VOC emissions from the coating processes within the automotive assembly paint shop.

A. Emission Units

Description: The automobile surface coating process is located in the automotive paint shop. The system applies coating to the vehicle bodies via an electrodeposition ("Ecoat") dip tank process, and then spray application of liquid primer ("Primer") and basecoat and clearcoat ("Topcoat"). The Ecoat, Primer, and Topcoat application processes are each followed by drying ovens.

The RTO directly abates sources in FGAUTOASSEMBLY, including: EUECOAT (tank and curing oven), EUPRIMER (oven), EUTOPCOAT (oven).

The RTO also abates sources in FGAUTOASSEMBLY through the concentrator, including: EUPRIMER (coating booth), EUTOPCOAT (coating booth).

B. Applicable Regulations, Emission Limit, Monitoring Requirements

Permit Number(s): PTI #14-19A

Emission Limits

PTI:

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Underlying Applicable Requirements
1.VOC	381.2 TPY	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	R 336.1205(1)(a) & (b), R 336.1702(a), R 336.2908(3)
2. VOC	3.0 pounds per job	12-month rolling time period as determined at the end of each calendar month	FGAUTOASSEMBLY	R 336.1702(a), R336.2908

Monitoring Requirements: RTO's combustion chambers' average temperature and concentrator's desorption gas inlet temperature.

C. Control Technology

The RTO controls the VOC emissions from: The Ecoat tank and ovens (2), the primer ovens (2), the color ovens (2), and the concentrators. The first compliance destruction efficiency performance test for the newly installed RTO was conducted in September 2021, with the results still pending. Until such time that the test report is finalized, the plant continues to operate the RTO in accordance with manufacturer's recommendations, using an operating temperature set point of 1450°F and an assumed DE of 95%. The concentrators (2) receive VOC emissions from the Primer booths and the Topcoat booths and heated flash-off area. The first compliance capture efficiency performance test for the newly installed concentrators was conducted in September 2021, with the results still pending. Until such time that the test report is finalized, the plant continues to operate the concentrators in accordance with manufacturer's recommendations, using a desorb inlet operating temperature set point of 370°F and an assumed concentration/capture efficiency of 90%.

FCA US LLC, Detroit Assembly Complex - Mack

Compliance Assurance Monitoring (CAM) Plan

II. Monitoring Approach

	Desorption Temperature	RTO Temperature
A. Indicator	The desorption gas inlet temperature is measured with a thermocouple. The temperatures are monitored continuously and recorded at equally spaced intervals at least once every 15 minutes.	RTO combustion temperature is measured by three thermocouples, one per combustion chamber. The average of the three readings is used for compliance. The temperature is monitored continuously and recorded at equally spaced intervals at least once every 15 minutes.
B. Indicator Range	The desorption gas inlet temperature shall be above the temperature from the most recent acceptable performance test (minus 15°F). The temperature set point is currently the manufacturer's recommended temp of 1450°F (to be updated upon finalization of the performance test report).	The RTO temperature shall be a minimum temperature of 370°F (the manufacturer's recommended temperature, to be updated upon finalization of the performance test report).
C. Bypass System Detection	The PTI flexible group, FGCONTROLS special condition no. VI.6 requires bypass monitoring for each bypass valve such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made.	

FCA US LLC, Detroit Assembly Complex - Mack

Compliance Assurance Monitoring (CAM) Plan

III. Performance Criteria

	Desorption Temperature	RTO Temperature
A. Data Representativeness	There is one thermocouple associated with each desorption unit (2).	There is a thermocouple located in each combustion chamber.
B. Verification of Operational Status	The system is new	
C. QA/QC Practices and Criteria	Validation of thermocouple accuracy or recalibration of each temperature thermocouple a minimum of once every 12 months. The thermocouple may be replaced in lieu of validation.	
D. Monitoring Frequency	Continuous, and recorded at equally spaced intervals at least once every 15 minutes.	
E. Data Collection Procedures and Averaging Period; and excursion	FCA collects the temperature records on its Factory Information System ("FIS") from the average of the multiple thermocouples. Excursions are defined as the following: a. A temperature excursion is defined as a failure to meet the temperature requirements of EUTOPCOATSC IV.1 b. A monitoring excursion is defined as a failure to properly monitor as required by FGCONTROLS SC VI.1 and 2. c. An operation and maintenance excursion is defined as a failure to properly implement and/or maintain requirements in FGCONTROLS SC VI. 6 & 7a. Note: the averaging time for a temperature excursion is 3 hours.	

FCA US LLC, Detroit Assembly Complex - Mack

Compliance Assurance Monitoring (CAM) Plan

IV. Justification

A. Rational for Selection of Performance Indicators

The average RTO combustion chamber temperature was selected because it is indicative of the VOC destruction occurring within the RTO and is a widely accepted method of monitoring. If the chamber temperature decreases significantly, then complete combustion may not occur, reducing the destruction efficiency. Therefore, the requirement to monitor temperature and maintain appropriate records is a justification for assuring VOC destruction efficiency. Temperature monitoring is specifically identified in the monitoring/recordkeeping requirements under the current PTI flexible group, FGCONTROLS SC VI.2.

B. Rational for Selection of Indicator Ranges

The selected indicator for the RTO is the minimum average combustion chamber temperature of 1450°F (pending finalization of the destruction efficiency test report), which is required to meet 95% destruction efficiency. The selected indicator of the desorb is maintain the temperature above the temperature from the most recent acceptable performance test minus 15°F.

C. Performance Test

A compliance performance test was performed in September 2021 on the RTO and the concentrators. Upon finalization of the report and submission to the AQD, this section will be updated with the specific control device operating parameters.

APPENDIX B

Redline Copy of Current JNAP ROP

Michigan Department of Environmental Quality
Air Quality Division

EFFECTIVE DATE: JUNE 9, 2017

ISSUED TO

FCA US~~,~~ LLC ~~– JEFFERSON NORTH ASSEMBLY PLANT~~

State Registration Number (SRN): N2155

LOCATED AT

Jefferson North Assembly Plant
2101 Conner Avenue, Detroit, Michigan 48215
and
Detroit Assembly Complex Mack
4000 Saint Jean Street, Detroit, Michigan 48214

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N2155-2017

Expiration Date: JUNE 9, 2022

Administratively Complete ROP Renewal Application Due
Between 12-09-2020 and 12-09-2021

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N2155-2017

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

Wilhemina McLemore, Detroit District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**

- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**

- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**

2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. **(R 336.1213(1)(b))**

3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**

4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
   a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
   c. Inspect, at reasonable times, any of the following:
      i. Any stationary source.
      ii. Any emission unit.
      iii. Any equipment, including monitoring and air pollution control equipment.
      iv. Any work practices or operations regulated or required under the ROP.
   d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.

5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**

7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**

8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

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

10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

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

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

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

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).[2] **(R 336.2001)**

14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**

15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
    a. The date, location, time, and method of sampling or measurements.
    b. The dates the analyses of the samples were performed.
    c. The company or entity that performed the analyses of the samples.
    d. The analytical techniques or methods used.
    e. The results of the analyses.
    f. The related process operating conditions or parameters that existed at the time of sampling or measurement.

17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**

19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**

20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**

21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
    a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
    b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
    c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
    a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
    b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.

23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**

24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**

25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.[2] **(R 336.1912)**

Permit Shield

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

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

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

c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
    a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
    b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
    c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
    d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
    e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**

29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**

31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**

32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**

33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
    a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
    b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**

c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

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

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.

37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).

39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
    a. June 21, 1999,
    b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
    c. The date on which a regulated substance is first present above a threshold quantity in a process.

40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.

41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.[2] **(R 336.1201(1))**

44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.[2] **(R 336.1201(8), Section 5510 of Act 451)**

45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.[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, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.[2] **(R 336.1201(4))**

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).

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-GRINDING	Welding, grinding, and sanding operations.	1/1/1991	FG-FACILITY
EU-SEALERS	Sealers and adhesives used in frame/body and paint are applied to the vehicles. Emissions are released, uncontrolled, to the general in-plant environment.	1/1/1991	FG-FACILITY FG-AUTO-MACT
EU-ECOAT	Auto bodies are primed in an enclosed electrocoat dip tank system followed by a curing oven.	1/1/1991	FG-FACILITY FG-CONTROLS FG-AUTO-MACT
EU-GUIDECOAT	A powder guidecoat system used to apply a coating in-between the electrocoat and topcoat.		FG-FACILITY FG-AUTO-MACT
EU-TOPCOAT1	Topcoat is applied to vehicles automatically and manually in booths. Vehicles pass through associated curing oven(s).	1/1/1991	FG-FACILITY FG-CONTROLS FG-AUTO-MACT
EU-TOPCOAT2	Topcoat is applied to vehicles automatically and manually in booths. Vehicles pass through associated curing oven(s).	1/1/1991	FG-FACILITY FG-CONTROLS FG-AUTO-MACT
EU-TOPCOAT3	Topcoat is applied to vehicles automatically and manually in booths. Vehicles pass through associated curing oven(s).	8/1/1998	FG-FACILITY FG-CONTROLS FG-AUTO MACT
EU-TOUCHUP	Blemished areas on vehicles are identified and repaired. This process is performed manually and emissions are vented into the in-plant environment.	1/1/1991	FG-FACILITY FG-AUTO-MACT
EU-FINALSEALER	Sealers are applied to auto bodies manually and robotically. Sealer is air cured, and the exhaust is vented in the plant.	1/1/1991	FG-FACILITY FG-AUTO-MACT

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-GASFILL	Fuel is dispensed into the vehicle tank and vapors from the filling operations are controlled via on-board refueling vapor recovery (ORVR).	1/1/1991	FG-FACILITY
EU-WINDSHIELDFILL	Windshield fluid fill station.	1/1/1991	FG-FACILITY
EU-LOWBAKE	Blemished areas on finished vehicles are repaired in booths. This includes any preparations such as sanding. The blemished area is painted and cured in booths. Stacks are used for exhaust.	1/1/1991	FG-FACILITY FG-AUTO MACT
EU-WIPE	Auto bodies are manually wiped with solvents during different phases of painting and assembly. The emissions are vented into the plant or through a stack.	1/1/1991	FG-FACILITY FG-AUTO-MACT
EU-PURGE	Purge and non-production solvents associated with EUTOPCOAT1, EUTOPCOAT2, and EUTOPCOAT3.	1/1/1991	FG-FACILITY FG-AUTO-MACT
EU-TF-O-004	Ethylene Glycol Tank-3, capacity = 15,000 gal	10/6/1989	FG-FACILITY
EU-TF-O-005	Gasoline Tank-4, capacity = 15,000 gal	10/6/1989	FG-FACILITY
EU-TF-O-006	Gasoline Tank-5, capacity = 15,000 gal	10/6/1989	FG-FACILITY
EU-METHANOLTANK	Methanol storage tank used for windshield washer fill.	10/6/1989	FG-FACILITY FG-OLD-MACT
EU-BOILER1	Hot water is generated for plant use in a natural gas boiler. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust. The boiler has a rated capacity of 70 MMBtu/hr.	1/1/1991	FG-FACILITY FG-BOILER-MACT
EU-BOILER2	Hot water is generated for plant use in a natural gas boiler. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust. The boiler has a rated capacity of 70 MMBtu/hr.	1/1/1991	FG-FACILITY FG-BOILER-MACT
EU-BOILER3	Hot water is generated for plant use in a natural gas boiler. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust. The boiler has a rated capacity of 70 MMBtu/hr.	1/1/1991	FG-FACILITY FG-BOILER-MACT

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-BOILER4	Hot water is generated for plant use in a natural gas boiler. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust. The boiler has a rated capacity of 70 MMBtu/hr.	1/1/1991	FG-FACILITY FG-BOILER-MACT
EU-COLDCLEANER	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.		FG-FACILITY FG-COLDCLEANERS
EU-RULE287(c))	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c).		FG-FACILITY FG-RULE287(c)
EU-RULE 290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.		FG-FACILITY FG-RULE290
EU-ENG-EFP	370 HP, diesel fueled, reciprocating internal combustion engine.	~~6/3/19912019~~1/6/2020	~~FG-FACILITY~~ FG-CI-RICE-~~MACT~~NEW
EU-ENG-WFP	370 HP, diesel fueled, reciprocating internal combustion engine.	6/3/1991	~~FG-FACILITY~~ -FG-CI-RICE-MACT
EU-MAINTENANCE_BOOTH	A Rule 287c exempt paint spray booth		FG-RULE287(c)

EU-GRINDING
EMISSION UNIT CONDITIONS

DESCRIPTION
Welding, grinding, and sanding operations.

Flexible Group ID: FG-FACILITY

POLLUTION CONTROL EQUIPMENT
Particulate matter collection/filtration equipment.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall operate any portion of EUGRINDING which exhaust externally with its respective particulate matter collection/filtration equipment installed and operating properly.[2] **(R336.1213(3))**

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))**

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

NA

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).

~~FCA US, LLC~~
~~JEFFERSON NORTH ASSEMBLY PLANT~~
~~ROP No: MI-ROP-N2155-2017~~
~~Expiration Date: JUNE 9, 2022~~
~~PTI No: MI-PTI-N2155-2017~~

EU-SEALERS
EMISSION UNIT CONDITIONS

DESCRIPTION
Sealers and adhesives used in frame/body and paint are applied to the vehicles.

Flexible Group ID: FG-FACILITY

POLLUTION CONTROL EQUIPMENT
NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

1. The VOC content of each sealer and adhesive, as applied, shall be determined using federal Reference Test Method 24 at representative time(s) and temperature(s) used to cure the related coating or material in practice as provided by ASTM D2369-98, 1.4 and Note 3. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the test results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content of each sealer and adhesive shall be verified by testing at owner's expense.[2] **(R336.1205, R336.1702(a))**

See Appendix 5

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

NA

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).

EU-ECOAT
EMISSION UNIT CONDITIONS

DESCRIPTION
Auto bodies are primed in an enclosed electrocoat dip tank system followed by a curing oven. VOC emissions from the curing oven are controlled by two thermal oxidizers.

Flexible Group IDs: FG-FACILITY, FG-CONTROLS, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT
Two oven thermal oxidizers.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EU-ECOAT unless the two thermal oxidizers are both installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum temperature of 1,360 °F based upon a three hour average, or at the temperature during the most recent control device performance test which demonstrated compliance based upon a three hour average, and has a minimum retention time of 0.5 seconds.[2] **(R 336.1220(a), R 336.1225, R336.1910, 40 CFR 64.6(c)(1)(i),(ii))**

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

1. The VOC content, water content and density of the resin, pigment and additives, as added to the Electrocoat tank, shall be determined using federal Reference Test Method 24. Alternatively, the VOC content, water content and density of the subject materials may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of the resin, pigment and additives as added to the Electrocoat tank shall be verified by testing using federal Reference Test Method 24.[2] **(R336.1220)**

~~See Appendix 5~~

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

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

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

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

4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there are no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. **(40 CFR 64.9(a)(2)(i))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVST-PS-027	40[2]	69[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2. SVST-PS-102	40[2]	69[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**

IX. OTHER REQUIREMENT(S)

1. For the purpose of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(64.6(c)(2))**

   a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special condition IV.1.

2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

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).

EU-TOPCOAT1
EMISSION UNIT CONDITIONS

DESCRIPTION

Paint is applied to vehicles automatically and manually in booths. Vehicles proceed through a curing oven. This line consists of three basecoat robot zones, basecoat electrostatic bells, basecoat automatic conventional zone, heated flash zone, two clearcoat robot zones, clearcoat electrostatic bells zone and a cure oven. Emissions from the basecoat bell zone, basecoat automatic conventional zone, heated flash, and clearcoat bell zones are ducted to a filter house, concentrator, and a thermal oxidizer. Emissions from the oven are controlled by a separate thermal oxidizer.

Flexible Group IDs: FG-FACILITY, FG-CONTROLS, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

A water wash system, a concentrator, and two thermal oxidizers.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the spray booth portions of EU-TOPCOAT1 unless the water wash particulate controls are installed, maintained and operated in a satisfactory manner. Satisfactory operation of the water wash particulate controls includes conducting the required monitoring and recordkeeping pursuant to FG-FACILITY, SC VI. 2.[2] **(R336.1205, R336.1220, R336.1331, R336.1910)**

2. The permittee shall not operate the oven portion of EU-TOPCOAT1 unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum temperature of 1,310 °F based upon a three hour average, or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average, and a minimum retention time of 0.5 seconds.[2] **(R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))**

3. The permittee shall not operate the paint spray booth portions (basecoat bell zone, basecoat automatic conventional zone, heated flash, and clearcoat bell zones) of EU-TOPCOAT1 unless the thermal oxidizer and the concentrator are both installed, maintained and operated in a satisfactory manner. Satisfactory operation of

thermal oxidizer includes maintaining a minimum combustion chamber temperature of 1325°F, or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average and a minimum retention time of 0.5 seconds. Satisfactory operation of adsorption wheels include maintaining a minimum desorption gas inlet temperature of no more than 15°F below the average desorption gas inlet temperature during the most recent acceptable performance test values.[2] **(R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))**

V. TESTING/SAMPLING

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

1. The VOC content of any coating or material as applied or as received shall be determined using federal Reference Test Method 24 and formulation data as specified in the USEPA "Protocol for Determining the Daily Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. Upon request of the AQD District Supervisor, the analytical VOC content, as received, of each non-waterborne coating shall be verified by testing at owner's expense.[2] **(R336.1205, R336.1702(a), 40 CFR 60 Subpart MM)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

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

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

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

4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there are no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. **(40 CFR 64.9(a)(2)(i))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVST-PS-039 (EU-TOPCOAT1)	120[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2. SVST-PS-041	108[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
3. SVST-PS-043	108[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
4. SVST-PS-001	88[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
5. SVST-PS-004	55[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
6. SVST-PS-047	26[2]	69[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**

IX. OTHER REQUIREMENT(S)

1. For the purpose of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(64.6(c)(2))**

   a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special conditions IV.2 and IV.3.

2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

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).

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~~ROP No: MI-ROP-N2155-2017~~
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~~PTI No: MI-PTI-N2155-2017~~

EU-TOPCOAT2
EMISSION UNIT CONDITIONS

DESCRIPTION

Paint is applied to vehicles automatically and manually in booths. Vehicles proceed through a curing oven. This line consists of three basecoat robot zones, basecoat electrostatic bells, basecoat automatic conventional zone, heated flash zone, two clearcoat robot zones, clearcoat electrostatic bells zone and a cure oven. Emissions from the basecoat bell zone, basecoat automatic conventional zone, heated flash, and clearcoat bell zones are ducted to a filter house, concentrator, and a thermal incinerator. Emissions from the oven are controlled by a separate thermal incinerator.
Note: There are two thermal incinerators for this emission unit.

Flexible Group IDs: FG-FACILITY, FG-CONTROLS, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

A water-wash system, a concentrator, and two thermal oxidizers.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1 The permittee shall not operate the spray booth portions of EU-TOPCOAT2 unless the water wash particulate controls are installed, maintained and operated in a satisfactory manner. Satisfactory operation of the water wash particulate controls includes conducting the required monitoring and recordkeeping pursuant to FG-FACILITY, SC VI. 3.[2] **(R336.1205, R336.1220, R336.1331, R336.1910)**

2. The permittee shall not operate the oven portion of EU-TOPCOAT2 unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum temperature of 1,310 °F based upon a three hour average, or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average, and a minimum retention time of 0.5 seconds.[2]
(R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))

3. The permittee shall not operate the paint spray booth portions (basecoat bell zone, basecoat automatic conventional zone, heated flash, and clearcoat bell zones) of EU-TOPCOAT2 unless the thermal oxidizer and

the concentrator are both installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum combustion chamber temperature of 1330°F or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average and a minimum retention time of 0.5 seconds. Satisfactory operation of the adsorption wheels include maintaining a minimum desorption gas inlet temperature of no more than 15°F below the average desorption gas inlet temperature during the most recent acceptable performance test values.[2] **(R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))**

V. TESTING/SAMPLING

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

1. The VOC content of any coating or material as applied or as received shall be determined using federal Reference Test Method 24 and formulation data as specified in the USEPA "Protocol for Determining the Daily Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. Upon request of the AQD District Supervisor, the analytical VOC content, as received, of each non-waterborne coating shall be verified by testing at owner's expense.[2] **(R336.1205, R336.1702(a), 40 CFR 60 Subpart MM)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

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

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

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

4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there are no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. **(40 CFR 64.9(a)(2)(i))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVST-PS-040 (EU-TOPCOAT2)	120[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2. SVST-PS-042	108[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
3. SVST-PS-044	108[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
4. SVST-PS-002	88[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
5. SVST-PS-004	55[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
6. SVST-PS-048	26[2]	69[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**

IX. OTHER REQUIREMENT(S)

1. For the purpose of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(64.6(c)(2))**

   a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special conditions IV.2 and IV.3.

2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

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).

EU-TOPCOAT3
EMISSION UNIT CONDITIONS

DESCRIPTION

Paint is applied to vehicles automatically and manually in booths. Vehicles proceed through a curing oven. This line consists of three basecoat robot zones, basecoat electrostatic bells, basecoat automatic conventional zone, heated flash zone, two clearcoat robot zones, clearcoat electrostatic bells zone and a cure oven. Emissions from the basecoat bell zone, basecoat automatic conventional zone, heated flash, and clearcoat bell zones are ducted to a filter house, concentrator, and a thermal incinerator. Emissions from the oven are controlled by a separate thermal incinerator.
Note: There are two thermal incinerators for this emission unit.

Flexible Group IDs: FG-FACILITY, FG-CONTROLS, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT

A water-wash system, a concentrator, and two thermal oxidizers

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the spray booth portions of EU-TOPCOAT3 unless the water wash particulate controls are installed, maintained and operated in a satisfactory manner. Satisfactory operation of the water wash particulate controls includes conducting the required monitoring and recordkeeping pursuant to FG-FACILITY, SC VI. 3.[2] **(R336.1205, R336.1220, R336.1331, R336.1910, 40 CFR 52.21(x)(6)(iv))**

2. The permittee shall not operate the oven portion of EU-TOPCOAT3 unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizer includes maintaining a minimum temperature of 1,310 °F based upon a three hour average, or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average, and a minimum retention time of 0.5 seconds.[2]
(R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))

3. The permittee shall not operate EU-TOPCOAT3 unless the spray booth thermal oxidizer and the concentrator are all installed, maintained and operated in a satisfactory manner. Satisfactory operation of thermal oxidizers

includes maintaining a minimum combustion chamber temperature of 1310°F based upon a three hour average, or at the temperature during the most recent control device performance test which demonstrated compliance with a minimum of 95% destruction efficiency based upon a three hour average, and a minimum retention time of 0.5 seconds. Satisfactory operation of the adsorption wheels include maintaining a minimum desorption gas inlet temperature of no more than 15°F below the average desorption gas inlet temperature during the most recent acceptable performance test values.[2] **(R 336.1220(a), R 336.1225, 40 CFR 64.6(c)(1)(i),(ii))**

V. TESTING/SAMPLING

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

1. The VOC content of any coating or material as applied or as received shall be determined using federal Reference Test Method 24 and formulation data as specified in the USEPA "Protocol for Determining the Daily Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA 453/R-08-002, as amended. Upon request of the AQD District Supervisor, the analytical VOC content, as received, of each non-waterborne coating shall be verified by testing at owner's expense.[2] **(R336.1205, R336.1702(a), 40 CFR 60 Subpart MM)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

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

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

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

4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there are no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. **(40 CFR 64.9(a)(2)(i))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVST-PS-089	120[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2. SVST-PS-090	120[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
3. SVST-PS-091	120[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
4. SVST-PS-036	85[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
5. SVST-PS-037	41[2]	113[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
6. SVST-PS-095	40[2]	69[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**

IX. OTHER REQUIREMENT(S)

1. For the purpose of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(64.6(c)(2))**

   a. A temperature excursion is defined as a confirmed three-hour period during which the average fails to meet the specified temperature requirements in special condition IV.2.

2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

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).

EU-TOUCHUP
EMISSION UNIT CONDITIONS

DESCRIPTION
Blemished areas on vehicles are identified and repaired. This process is performed manually and emissions are vented into the in-plant environment.

Flexible Group IDs: FG-FACILITY, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT
NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

1. The VOC content, water content and density of any coating or material as applied and as received, shall be determined using federal Reference Test Method 24. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content and density of any coating or material shall be verified using federal Reference Test Method 24.[2] **(R336.1205, R336.1702(a), 40CFR 52.21)**

See Appendix 5

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

NA

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).

EU-FINALSEALER
EMISSION UNIT CONDITIONS

DESCRIPTION
Sealers are applied to auto bodies manually and robotically. Sealer is air cured and the exhaust is vented in the plant.

Flexible Group IDs: FG-FACILITY, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT
NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

1. The VOC content of each final sealer and adhesive, as applied, shall be determined using federal Reference Test Method 24 at representative time(s) and temperature(s) used to cure the related coating or material in practice as provided by ASTM D2369-98, 1.4 and Note 3. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the test results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content of each sealer and adhesive shall be verified by testing at owner's expense.[2] **(R336.1205, R336.1224, R336.1225, R336.1702(a), 40 CFR 52.21)**

See Appendix 5

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

NA

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).

EU-GASFILL
EMISSION UNIT CONDITIONS

DESCRIPTION
Fuel is dispensed into the vehicle tank and vapors from the filling operations are controlled via on-board refueling vapor recovery (ORVR).

Flexible Group ID: FG-FACILITY

POLLUTION CONTROL EQUIPMENT
ORVR

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The assembly line gasoline dispensing station shall be controlled by a Stage II vapor balance system or an equivalent system unless filled vehicles are equipped with on-board refueling vapor recovery (ORVR).[2] **(R336.1702(a), R336.1703)**

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

NA

See Appendix 5

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

NA

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).

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~~JEFFERSON NORTH ASSEMBLY PLANT~~
~~ROP No: MI-ROP-N2155-2017~~
~~Expiration Date: JUNE 9, 2022~~
~~PTI No: MI-PTI-N2155-2017~~

EU-WINDSHIELDFILL
EMISSION UNIT CONDITIONS

DESCRIPTION
Windshield fluid fill station.

Flexible Group ID: FG-FACILITY

POLLUTION CONTROL EQUIPMENT
NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

1. The VOC content, water content and density of any material as applied and as received, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of any material shall be verified using federal Reference Test Method 24.[2] **(R 336.1220(a), R 336.2040, R 336.2041)**

See Appendix 5

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

NA

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).

EU-LOWBAKE
EMISSION UNIT CONDITIONS

DESCRIPTION
Blemished areas on finished vehicles are repaired in booths. This includes any preparations such as sanding. The blemished area is painted and cured in booths. Stacks are used for exhaust.

Flexible Group IDs: FG-FACILITY, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT
Dry filters.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall operate the coating spray booths with the dry filters installed and operating properly.[2] **(R336.1205, R336.1220, R336.1702(a))**

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

1. The VOC content, water content and density of any low bake material as applied and as received, shall be determined using federal Reference Test Method 24. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content, water content and density of any coating or material shall be verified using federal Reference Test Method 24.[2] **(R336.1205, R336.1224, R336.1225, R336.1702(a), 40 CFR 52.21)**

See Appendix 5

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVST-AS-076	34[2]	58[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
2. SVST-AS-077	34[2]	58[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
3. SVST-AS-078	34[2]	58[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
4. SVST-AS-079	34[2]	58[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
5. SVST-AS-080	34[2]	58[2]	**R336.1225, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)**
6. SVST-AS-082	54[2]	58[2]	**R336.1225, 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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-WIPE
EMISSION UNIT CONDITIONS

DESCRIPTION
Auto bodies are manually wiped with solvents during different phases of painting and assembly. The emissions are vented into the plant or through a stack.

Flexible Group IDs: FG-FACILITY, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT
NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

1. The VOC content, water content and density of any solvent as applied and as received, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of any material shall be verified using federal Reference Test Method 24.[2] **(R 336.1220(a), R 336.2040, R 336.2041)**

See Appendix 5

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

NA

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).

EU-PURGE
EMISSION UNIT CONDITIONS

DESCRIPTION
Purge and non-production solvents associated with EU-TOPCOAT1, EU-TOPCOAT2, and EU-TOPCOAT3.

Flexible Group IDs: FG-FACILITY, FG-AUTO-MACT

POLLUTION CONTROL EQUIPMENT
NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

1. The VOC content, water content and density of any solvent as applied and as received, shall be determined using federal Reference Test Method 24 or an alternative approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content, water content and density of any material shall be verified using federal Reference Test Method 24. **(R 336.1220(a), R 336.2040, R 336.2041)**

See Appendix 5

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

NA

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).

EU-BOILER1
EMISSION UNIT CONDITIONS

DESCRIPTION
Hot water is generated for plant use in Natural Gas Boiler No. 1. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust from the boiler.

Flexible Group IDs: FG-FACILITY, FG-BOILER-MACT

POLLUTION CONTROL EQUIPMENT
Low-NOx burners and flue gas recirculation.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-BOILER1 unless both the flue gas re-circulation system and the low NOx burners are installed and operating properly.[2] **(R336.1910)**

2. The permittee shall burn only natural gas or virgin distillate oil, hereinafter "No. 2 fuel oil," in EU-BOILER1. "Virgin oil" is defined in the context of this permit as fuel oil originating from a petroleum refinery and has not been adulterated by the addition of any amount of used oils, off specification oils, waste oils, recycled oils, or hazardous substances.[2] **(R336.1205)**

3. The permittee shall not fire natural gas and No. 2 fuel oil simultaneously in EU-BOILER1 except during changeover between fuels and shall start up each boiler with natural gas prior to firing with No. 2 fuel oil, if natural gas is available during startup.[2] **(R336.1205)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

NA

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVST-EC-001	45[2]	75[2]	**R336.1225, 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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-BOILER2
EMISSION UNIT CONDITIONS

DESCRIPTION
Hot water is generated for plant use in Natural Gas Boiler No. 2. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust from the boiler.

Flexible Group IDs: FG-FACILITY, FG-BOILER-MACT

POLLUTION CONTROL EQUIPMENT
Low NOx burners and flue gas recirculation.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-BOILER2 unless both the flue gas re-circulation system and the low NOx burners are installed and operating properly.[2] **(R336.1910)**

2. The permittee shall burn only natural gas or virgin distillate oil, hereinafter "No. 2 fuel oil," in EU-BOILER2. "Virgin oil" is defined in the context of this permit as fuel oil originating from a petroleum refinery and has not been adulterated by the addition of any amount of used oils, off specification oils, waste oils, recycled oils, or hazardous substances.[2] **(R336.1205)**

3. The permittee shall not fire natural gas and No. 2 fuel oil simultaneously in EU-BOILER2 except during changeover between fuels and shall start up each boiler with natural gas prior to firing with No. 2 fuel oil, if natural gas is available during startup.[2] **(R336.1205)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

NA

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVST-EC-002	45[2]	75[2]	**R336.1225, 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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-BOILER3
EMISSION UNIT CONDITIONS

DESCRIPTION
Hot water is generated for plant use in Natural Gas Boiler No. 3. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust from the boiler.

Flexible Group IDs: FG-FACILITY, FG-BOILER-MACT

POLLUTION CONTROL EQUIPMENT
Low NOx burners and flue gas recirculation.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-BOILER3 unless both the flue gas re-circulation system and the low NOx burners are installed and operating properly.[2] **(R336.1910)**

2. The permittee shall burn only natural gas or virgin distillate oil, hereinafter "No. 2 fuel oil," in EU-BOILER3. "Virgin oil" is defined in the context of this permit as fuel oil originating from a petroleum refinery and has not been adulterated by the addition of any amount of used oils, off specification oils, waste oils, recycled oils, or hazardous substances.[2] **(R336.1205)**

3. The permittee shall not fire natural gas and No. 2 fuel oil simultaneously in EU-BOILER3 except during changeover between fuels and shall start up each boiler with natural gas prior to firing with No. 2 fuel oil, if natural gas is available during startup.[2] **(R336.1205)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

NA

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVST-EC-003	45[2]	75[2]	**R336.1225, 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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EU-BOILER4
EMISSION UNIT CONDITIONS

DESCRIPTION
Hot water is generated for plant use in Natural Gas Boiler No. 4. The boiler uses low NO_X burners and flue gas recirculation and a stack is utilized for exhaust from the boiler.

Flexible Group IDs: FG-FACILITY, FG-BOILER-MACT

POLLUTION CONTROL EQUIPMENT
Low NOx burners and flue gas recirculation.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EU-BOILER4 unless both the flue gas re-circulation system and the low NOx burners are installed and operating properly. **(R336.1910)**

2. The permittee shall burn only natural gas or virgin distillate oil, hereinafter "No. 2 fuel oil," in EU-BOILER4. "Virgin oil" is defined in the context of this permit as fuel oil originating from a petroleum refinery and has not been adulterated by the addition of any amount of used oils, off specification oils, waste oils, recycled oils, or hazardous substances. **(R336.1205)**

3. The permittee shall not fire natural gas and No. 2 fuel oil simultaneously in EU-BOILER4 except during changeover between fuels and shall start up each boiler with natural gas prior to firing with No. 2 fuel oil, if natural gas is available during startup. **(R336.1205)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

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

NA

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

NA

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVST-EC-004	45[2]	100[2]	**R336.1225, 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).
[2] This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-FACILITY	This flexible group covers all equipment used for automotive assembly and painting operations for the Jefferson North Assembly Plant.	All EU's and FG's in this permit associated with equipment used for the assembly and painting of automobiles.
FG-CONTROLS	VOC concentrators and regenerative thermal oxidizers used for control of VOC emissions from the paint spray booths and curing ovens (excluding guidecoat cure oven).	All emission units and flexible groups associated with automotive assembly and painting operations with VOC controls including: EU-ECOAT, EU-TOPCOAT1, EU-TOPCOAT2, and EU-TOPCOAT3.
FG-AUTO-MACT	Each new, reconstructed, or existing affected source as defined in 40 CFR 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts, and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 63.3081(c) is subject to the requirements of 40 CFR 63 Subpart IIII. This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.	EU-SEALERS EU-ECOAT EU-GUIDECOAT EU-TOPCOAT1 EU-TOPCOAT2 EU-TOPCOAT3 EU-TOUCHUP EU-FINALSEALER EU-WINDSHIELDFILL EU-LOWBAKE EU-WIPE EU-PURGE

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-OLD-MACT	The affected source is each new, reconstructed, or existing Organic Liquid Distribution (OLD) (non-gasoline) operation that is located at, or is part of a major source of hazardous air pollutant (HAP) emissions. The affected source is comprised of storage tanks, transfer racks, equipment leak components associated with storage tanks, transfer racks and pipelines, transport vehicles, and all containers while loading or unloading at transfer racks subject to this subpart. Equipment that is part of an affected source under another NESHAP is excluded from the affected source. **(40 CFR 63.2338(c))** These conditions specifically cover existing (construction pre dates April 2, 2002) liquid storage tanks which hold more than 5,000 gallons but less than 50,000 gallons and/or new liquid storage tanks which hold more than 5,000 gallons but less than 10,000 gallons of methanol/windshield washer fill solvents that are dispensed to newly assembled vehicles.	EU-METHANOLTANK
FG-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EU-COLDCLEANER
FG-RULE287(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 287(c).	EU-RULE287(c)
FG-RULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278 and 290.	EU-RULE290
FG-BOILER-MACT	This Flexible Group establishes the national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP as found in 40 CFR Subpart DDDDD.	EU-BOILER1 EU-BOILER2 EU-BOILER3 EU-BOILER4
FG-CI-RICE-MACT	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 RICE less than 500 bhp.	~~EU-ENG-EFP~~ EU-ENG-WFP
FG-CI-RICE-NEW	Emergency engines subject to 40 CFR Part 60, Subpart IIII, Standards of Performance for Compression Ignition Internal Combustion Engines. New emergency engines <500 HP at Major source.	EU-ENG-EFP

FG-FACILITY
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group covers all equipment used for automotive assembly and painting operations for the Jefferson North Assembly Plant.

Emission Units: All emission units and flexible groups associated with automotive assembly and painting operations. This includes clean up and purge activities, storage tanks, boilers, and paint sludge handling and disposal operations. Additionally, this includes but is not limited to the following emission units: ~~EU-PMRCOLDCLEANER,~~ EU-GRINDING, EU-SEALERS, EU-ECOAT, EU-GUIDECOAT, EU-TOPCOAT1, EU-TOPCOAT2, EU-TOPCOAT3, EU-TOUCHUP, EU-FINAL SEALER, EU-GAS FILL, EU-WINDSHIELDFILL, EU-LOWBAKE, EU-WIPE, EU-PURGE, EU-TF-O-004, EU-TF-O-005, EU-TF-O-006, EU-BOILER1, EU-BOILER2, EU-BOILER3, EU-BOILER4, EU-COLDCLEANER, ~~EU-RULE287(c)), EU-RULE 290~~, ~~EU-ENG-EFP, EU-ENG-WFP~~

POLLUTION CONTROL EQUIPMENT

Three VOC concentrators to control clearcoat booths, basecoat booths, and basecoat flash. Eight thermal oxidizers to control e-coat oven, clearcoat booths, basecoat booths, basecoat flash, topcoat ovens. A waterwash system used to control particulate from three topcoat lines. All vehicles are equipped with an ORVR system to control the gasoline filling operations. Dry filtration is used to control particulate emissions from the color prep booths, the welding, grinding, sanding operations and the low bake/spot repair operations.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	1085.8 tpy[2]	12-month rolling time period.	FG-FACILITY	SC VI.1	**R 336.1225, R 336.1702(a), 40 CFR 52.21**
2. VOC	4.8 lbs per job[2,a]	12-month rolling time period.	FG-FACILITY	SC VI.1	**R 336.1225, R 336.1702(a), 40 CFR 52.21**
3. PM 10	42.4 tpy[2]	12-month rolling time period.	FG-FACILITY	SC V.1, SC V.2 and SC VI.1	**R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)**
4. NOx	153.9 tpy[2]	12-month rolling time period.	FG-FACILITY	SC V.3 and SC VI.1	**R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)**
5. CO	133.65 tpy[2]	12-month rolling time period.	FG-FACILITY	SC V.4 and SC VI.1	**R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
6. SO2	3.4[2] tpy	12-month rolling time period.	FG-FACILITY	SC VI.1	**R 336.1205, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)**

[a] In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined VOC emission limit shall be considered compliance with the VOC emission limit established by **R 336.1225, R 336.1702(a) and 40 CFR 52.21** and also compliance with the VOC emissions limit in **40 CFR 60.392**, an additional applicable requirement that has been subsumed within this condition.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Natural gas	3,719.7 MM cubic feet[2]	12-month rolling time period	FG-FACILITY	SC VI.1	**R336.1205(1)(a)**
2. No. 2 fuel oil	160,340 gallons[2]	12-month rolling time period	FG-FACILITY	SC VI.1	**R336.1205(1)(a)**
3. Sulfur content of the No. 2 fuel oil	0.3% by weight[2]	Instantaneous	FG-FACILITY	SC VI.1	**R336.1401**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each spray coating or scuff booth operation which directly vents to the outdoor air with water wash particulate controls unless another particulate control technology is specified.[2] **(R 336.1301, R 336.1331)**

V. TESTING/SAMPLING

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

1. At least once every five years, unless the permittee maintains a yearly demonstration that the most recent acceptable performance test remains valid and representative, the permittee shall verify NOx emission rates from natural gas combustion in a single representative boiler by testing at owner's expense, in accordance with Department requirements. This testing shall consist of three sample runs. For the other three boilers, the permittee shall perform a single sample run to confirm that the NOx emissions are similar to those from the boiler on which the three sample runs were taken. If the single sample run does not show the NOx emissions to be similar, the permittee shall perform three sample runs on the boiler in question. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R 336.1205, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

2. At least once every five years, unless the permittee maintains a yearly demonstration that the most recent acceptable performance test remains valid and representative, the permittee shall verify CO emission rates from natural gas combustion in a single representative boiler by testing at owner's expense, in accordance with Department requirements. This testing shall consist of three sample runs. For the other three boilers, the permittee shall perform a single sample run to confirm that the CO emissions are similar to those from the boiler on which the three sample runs were taken. If the single sample run does not show the CO emissions to be similar, the permittee shall perform three sample runs on the boiler in question. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R 336.1205, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

3. At least once every five years, unless the permittee maintains a yearly demonstration that the most recent acceptable performance test remains valid and representative, the permittee shall verify the transfer efficiency of one representative Basecoat line, and one representative Clearcoat line, capture efficiency across one representative Topcoat line for both the booth and curing oven portions, and the destruction efficiency of all thermal oxidizers, and removal efficiency of all concentrators, by in-plant testing at owner's expense, in accordance with Department requirements, 40 CFR 51 Appendix M, and the USEPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA-453/R-08-002, as amended will be required. No less than 60 days prior to testing, a complete testing plan shall be submitted to the AQD District Supervisor. This testing plan must be approved by the Department prior to testing. A complete report of test results must be submitted to the District Supervisor within 60 days following the testing.[2] **(R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**

~~4. The permittee shall conduct an analysis for EU-ECoat as found in Appendix 5. **(R 336.1213(3))**~~

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep the following records/calculations in a format acceptable to the AQD District Supervisor. The permittee shall compile all required records and complete all required calculations and make them available within 30 days following the end of each calendar month for which records are required to be kept.

   a. For each material used in FG-FACILITY:[b]
      i. Material identification;
      ii. Material VOC content; and,
      iii. Material usage.

   b. Number of jobs each calendar month, where a job is defined as a painted vehicle leaving the assembly line.[b]

   c. Calculations showing the FG-FACILITY monthly and annual mass VOC emission rates, in tons per month and tons per 12-month rolling time period, as determined at the end of each calendar month. Calculations must show the capture and control efficiency of each control device used. Calculations must also include a sample calculation based on the production of a single job and that specifies all measured or assumed process parameters (e.g., transfer, capture and control efficiencies, booth splits, etc.) and VOC emissions due to natural gas combustion, purge and cleanup operations, storage tanks, and paint sludge handling and disposal operations. Prior to the initial testing, for each controlled section, the design combined capture and control efficiency may be used. Thereafter, values no greater than the most recently tested values may be used.[b]

   d. Calculations showing the VOC emission rate (lb/job) on a 12-month rolling basis, as determined at the end of each calendar month for the equipment covered by FG-FACILITY.[b]

   e. Calculations showing the PM-10 mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FG-FACILITY. Prior to the testing required

in SC V.1 and SC V.2 being completed, these calculations shall be performed according to a method acceptable to the AQD District Supervisor. After the testing required in SC V.1 and SC V.2 is completed, the PM-10 emission factors measured during the test shall be used to perform these calculations.

f. Calculations showing the NOx mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FG-FACILITY. Prior to the testing required in SC V.3 being completed, AP-42 emission factors shall be used to perform these calculations. After the testing required in SC V.3 is completed, the NOx emission factors measured during the test shall be used to perform these calculations.

g. Calculations showing the CO mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FG-FACILITY. Prior to the testing required in SC V.4 being completed, AP-42 emission factors shall be used to perform these calculations. After the testing required in SC V.4 is completed, the CO emission factors measured during the test shall be used to perform these calculations.

h. Calculations showing the SO2 mass emission rate in tons on a monthly and 12-month rolling time period, as determined at the end of each calendar month for the equipment in FG-FACILITY.

i. Records of the total natural gas used during each calendar month and 12-month rolling time period, in cubic feet.

j. Records of the total No. 2 fuel oil combusted in EU-BOILER1, EU-BOILER2, EU-BOILER3, and EU-BOILER4 during each calendar month and 12-month rolling time period, in gallons. Also, records of the sulfur content, in percent by weight, of all No. 2 fuel oil used.

k. Hours of operation for each calendar month and 12-month rolling time period.

All records/calculations shall be kept on file for a period of at least five years and made available to the Department upon request.[2,b] **(R 336.1225, R 336.1702(a))**

2. The permittee shall monitor the condition of each particulate control system through weekly visual inspections. The permittee shall keep records of visual inspections of each exhaust filter or water wash particulate control system which include the dates and results of the inspections, and the dates and reasons for repairs. All records shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1301, R 336.1331)**

3. The permittee shall maintain a record of the projects authorized by SC IX.3 and IX.4. This includes, at a minimum, maintaining documentation of testing and monitoring for each project demonstrating compliance with the applicable emission limits in SC I.1 through 6. All records shall be kept on file in a format acceptable to the District Supervisor and made available to the Department upon request.[2] **(R 336.1220(a), R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

See Appendix 7

[b] In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined VOC monitoring condition shall be considered compliance with the VOC monitoring condition established by **R 336.1225 and R 336.1702(a);** and also compliance with the VOC monitoring conditions in **40 CFR 60.393**, an additional applicable requirement that has been subsumed within this condition.

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

4. For each emission unit (EU) and flexible group (FG) included in this permit, the permittee shall submit to the AQD District Supervisor, in an acceptable format, within 30 days following the end of the quarter in which the data was collected, the actual VOC, PM-10, NOx, CO, and SO2 emission rates for each limit included in the permit.[2] **(R 336.1205, R 336.1220(a))**

5. The permittee shall notify the AQD District Supervisor, in writing, of projects authorized by SC IX.3 and 4 at least 30 days prior to initialization of the activity. The notification shall include, at a minimum, a description of the type of project and any changes in testing, monitoring, recordkeeping or other compliance evaluation activities.[2] **(R 336.1201)**

See Appendix 8

[c] In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined reporting condition shall be considered compliance with the reporting condition established by **R 336.1213(3)(c)(i)**; and also compliance with the VOC reporting condition in **40 CFR 60.395**, an additional applicable requirement that has been subsumed within this condition.

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
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. This permit covers automotive assembly and painting operations. Changes to these operations or replacement with a different process type are subject to the requirements of R 336.1201, except as disallowed by R 336.1278 or as allowed by R 336.1279 through R 336.1290 or SC IX.3 or 4.[2] **(R 336.1201)**

2. MDEQ has determined that compliance with the limits listed in SC I.1 through 2 provides a level of control that is at least equivalent to and not less stringent than the standards in 40 CFR 60.392, *et seq.* Accordingly, compliance with the limitations in this permit meets all applicable requirements of 40 CFR Part 60, Subpart MM.[2] **(40 CFR 60, Subpart MM)**

3. This permit authorizes any activities including projects involving physical changes or changes in the method of operation to existing emission units that do not require an increase in the emissions limits or performance levels specified in SC I.1 through 6. Such activities do not require the facility to obtain any federal or state air permits.[2] **(R 336.1201)**

4. This permit authorizes projects involving the installation of new emission units that do not require an increase in the emissions limits or performance levels specified in SC I.1 through 6 under the following conditions:

   a. As a state-only enforceable requirement, the new emission unit will not result in a meaningful change in the nature or quantity of toxic air contaminants emitted from the stationary source. The permittee must demonstrate to the department by testing or calculations that a meaningful change in the nature or quantity of toxic air contaminants has not occurred. The permittee may devise its own method to perform this demonstration subject to approval by the department. However, if the permittee demonstrates that all toxic air contaminant emissions from a new emissions unit are within the levels specified in R 336.1226 or R 336.1227, a meaningful change in toxic air contaminants has not occurred;

   b. The new emissions unit will not be a newly constructed or reconstructed major source of hazardous air pollutants as defined in and subject to 40 C.F.R. §63.2 and §63.5(b)(3), National Emission Standard for Hazardous Air Pollutants; and,

   c. The installation of the new emissions unit will not cause the violation of any applicable air requirement.

   A demonstration that the new installation meets these criteria shall be kept on site for the life of the new emissions unit and made available to the department upon request. The permittee must notify the department of the installation of the new emission unit. This notification must contain the information specified in R 336.1215(3)(c)(i) through (v). Construction of the new emission unit may commence upon submittal of the notice.[2] **(R 336.1201)**

5. The emission limits and performance levels specified in SC I.1 through 6 may be reviewed and or adjusted when newly applicable federal requirements or any other requirement that is enforceable as a practical matter and that the department, under its State Implementation Plan, may impose on the facility become applicable during the term of the permit that would lower allowable emissions. Adjustments to SC I.1 through 6 will be made through a permit revision as of the effective date of the new applicable requirements and will reflect the impact the new applicable requirements will have on the affected emission units. Initial compliance with the adjusted emission limits and performance levels will be demonstrated over the initial compliance period granted by the newly applicable federal requirement.[2] **(R 336.1225, R 336.1702(a))**

6. The permittee may, at any time, request that MDEQ terminate the flexible emission limit provisions of this permit and issue a traditional permit. In the event of such termination, the requirements of this permit shall remain in effect until a new permit is issued. At that time, the permit conditions for any existing emission unit that has not been modified and to which new requirements have not become applicable will revert to those found in the previous permits. For any new or modified emission unit, or any emission unit for which new requirements have become applicable the permit conditions will reflect requirements contemporaneous with the date of installation, modification or new requirement applicability.[2] **(R 336.1225, R 336.1702(a))**

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).

FG-CONTROLS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

VOC concentrators and regenerative thermal oxidizers used for control of VOC emissions from the paint spray booths and curing ovens (except guidecoat cure ovens).

Emission Units: All emission units and flexible groups associated with automotive assembly and painting operations with VOC controls including: EU-ECOAT, EU-TOPCOAT1, EU-TOPCOAT2, and EU-TOPCOAT3.

POLLUTION CONTROL EQUIPMENT

VOC concentrators and regenerative thermal oxidizers used for control of VOC emissions from portions of the painting operations and curing ovens (except guidecoat cure ovens).

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. ~~Within 90 days of issuance of this permit, the permittee shall develop, maintain and implement an Operation and Maintenance Plana Compliance Assurance Monitoring (CAM) Plan (O & M Plan) for FG-CONTROLS. The O & M PlanCAM Plan shall contain the minimum requirements as outlined in Appendix 3. The O & M Plan shall be CAM Plan shall be updated as necessary to reflect changes in equipment and monitoring, to implement corrective actions and to address malfunctions. Changes in the O & MCAM Plan as outlined in Appendix 3 shall be submitted to the AQD District Supervisor for review and approval. All records and activities associated with the O & MCAM Plan shall be made available to the Department upon request.[2] **(R 336.1220(a), R 336.1910, 64.6(c)(1)(i),(ii), 64.7(e))**~~

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall install, maintain and operate in a satisfactory manner, combustion chamber temperature monitoring devices for the thermal oxidizers in FG-CONTROLS to monitor and record the temperature on a continuous basis during operation. Temperature data recording shall consist of measurements made at equally spaced intervals at least once every 15 minutes. All records shall be kept on file and made available to the Department upon request.[a] **(R 336.1220(a), R 336.1910, 40 CFR 64.6(c)(1)(i),(ii))**

2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, temperature monitoring devices for the VOC concentrators in FG-CONTROLS to monitor and record the desorption gas inlet temperature on a continuous basis during operation. Desorption gas inlet temperature data recording shall consist of measurements made at equally spaced intervals at least once every 15 minutes. All records shall be kept on file and made available to the Department upon request.[a] **(R 336.1220(a), R 336.1910, 40 CFR 64.6(c)(1)(i),(ii))**

3. The permittee shall maintain records of maintenance and repair activities. Records shall identify the equipment inspected and the date of the inspection. The permittee shall also record any maintenance activities or corrective actions taken as a result of equipment inspections or due to malfunction. All records shall be kept on file and made available to the Department upon request. **(R 336.1910, 40 CFR 64.6(c)(1)(i),(ii))**

4. For each control device in operation during production (coating vehicles), the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was open and the length of time the bypass line was open shall be kept on file. **(40 CFR 64.3(a)(2))**

5. 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). **(40 CFR 64.7(d))**

6. 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), 64.7(c))**

7. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**

8. The permittee shall keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for each respective add-on control device used to demonstrate compliance with applicable VOC emissions limits: **(R 336.1910, R 336.1911, 40 CFR 64.6(c)(1)(I & ii), 40 CFR 64.7(e))**

~~Thermal Oxidizers~~

a. Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
b. Perform a heat exchanger visual internal inspection a minimum of once every 18 months.*

~~**Regenerative Thermal Oxidizers**~~

~~Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.~~
~~Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months.*~~

c. Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months.*

~~**VOC Concentrator**~~

~~Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.~~
d. Perform internal observation of concentrator adsorbent materials for contamination and erosion a minimum of once every 18 months.*
e. Observe and record the pressure drop across the concentrator a minimum of once every calendar quarter.

* The requirement to address this issue is satisfied if a performance test (i.e., stack test) has been performed on the control device within the prior 18 month period.

~~**See Appendix 3**~~

[a] In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined monitoring condition shall be considered compliance with the monitoring condition established by **R 336.1220(a), R 336.1910 and 40 CFR 64.6(c)(1)(i),(ii)**; and also compliance with the monitoring conditions in **40 CFR 60.394**, an additional applicable requirement that has been subsumed within this condition.

VII. REPORTING

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

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

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

4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions or exceedances, as applicable and the corrective actions taken. If there are no excursions or exceedances in the reporting period, then this report shall include a statement that there were no excursions or exceedances. **(40 CFR 64.9(a)(2)(i))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

1. For the purpose of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(64.6(c)(2))**

   a. A temperature excursion is defined as a confirmed three-hour period during which the average temperature fails to meet the specified temperature requirements in special conditions IV.2 and IV.3 of EU-TOPCOAT1, EU-TOPCOAT2 and EU-TOPCOAT3~~.~~, and condition IV.1 of EU-ECOAT.
   b. A monitoring excursion is defined as a failure to properly monitor as required in special conditions VI.1~~,~~ and VI.2 ~~and VI.3~~.
   c. A monitoring excursion is defined as failure to properly implement and/or maintain the ~~O&MCAM plan~~ requirements~~d~~ in special condition ~~III.1~~VI.4 and VI.8a.

2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

3. 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 CAM Plan ~~requirements within the O&M 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).

FG-AUTO-MACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Each new, reconstructed, or existing affected source as defined in 40 CFR 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts, and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 63.3081(c) is subject to the requirements of 40 CFR 63 Subpart IIII. This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.

Emission Unit: All emission units and flexible groups associated with automotive assembly and painting operations including: EU-SEALERS, EU-ECOAT, EU-GUIDECOAT, EU-TOPCOAT1, EU-TOPCOAT2, EU-TOPCOAT3, EU-TOUCHUP, EU-FINALSEALER, EU-WINDSHIELDFILL, EU-LOWBAKE, EU-WIPE and EU-PURGE

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	0.60 lb per GACS	Calendar month	EUECOAT, EUGUIDECOAT, EUTOPCOAT1, EUTOPCOAT2, EUTOPCOAT3, EUTOUCHUP, EULOWBAKE, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations in the Paint Shop.	SC III.3, SC V.1, SC VI.3	**40 CFR 63.3091(a)**
2. Organic HAP	1.10 lbs per GACS*	Calendar month	EUGUIDECOAT, EUTOPCOAT1, EUTOPCOAT2, EUTOPCOAT3, EUTOUCHUP, EULOWBAKE, glass bonding primer, and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations in the Paint Shop.	SC III.3, SC V.1, SC VI.3	**40 CFR 63.3091(b)**
3. Organic HAP	0.01 lb per lb of coating	Calendar month	NGB Adhesives and Sealers that are not components of glass bonding systems.	SC III.3, SC V.1, SC VI.3	**40 CFR 63.3090(c) or 63.3091(c)**
4. Organic HAP	0.01 lb per lb of coating	Calendar month	DEADENERS	Condition Nos. III.2, V.1 & VI.3	**40 CFR 63.3090(d) or 63.3091(d)**

* The permittee may choose to comply with this limit if the criteria in SC I.5 are met.

5. The permittee may choose to comply with either SC I.1 or 2. SC I.2 may be chosen only if EU-ECOAT meets either of the following requirements. **(40 CFR 63.3092)**

   a. Each individual material added to EU-ECOAT contains no more than 1.0 percent by weight of any organic HAP and no more than 0.10 percent by weight of any OHSA-defined carcinogenic organic HAP; or,
   b. The emissions from all EU-ECOAT bake ovens are captured and ducted to the oven thermal oxidizer which achieves a minimum destruction efficiency of at least 95 percent (by weight).

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which an emission limit has been established under SC I.1 through 4. The work practice plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented consistent with the requirements of 40 CFR 63.3094. The permittee shall comply with the applicable work practice plans at all times.[2]

   a. All organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers.

   b. Spills of organic-HAP containing coatings, thinners, cleaning materials, and waste materials must be minimized.

   c. Organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.

   d. Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.

   e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

   f. Organic HAP emissions from cleaning and from purging of equipment associated with all coating operations subject to emission limits in SC I.1 through 4 above must be minimized by addressing:

      i. Vehicle body wipe pursuant to 40 CFR 63.3094(c)(1)(i);

      ii. Coating line purging pursuant to 40 CFR 63.3094(c)(1)(ii);

      iii. Coating system flushing pursuant to 40 CFR 63.3094(c)(1)(iii);

      iv. Cleaning of spray booth grates pursuant to 40 CFR 63.3094(c)(1)(iv);

      v. Cleaning of spray booth walls pursuant to 40 CFR 63.3094(c)(1)(v);

      vi. Cleaning of spray booth equipment pursuant to 40 CFR 63.3094(c)(1)(vi);

vii. Cleaning of external spray booth areas pursuant to 40 CFR 63.3094(c)(1)(vii);

viii. Additional housekeeping measures pursuant to 40 CFR 63.3094(c)(1)(viii).

The permittee may choose to comply with an alternative to the work practice standard, after receiving prior approval from the USEPA in accordance with 40 CFR 63.6(g).[2] **(40 CFR 63.3100(c), 40 CFR 63.4493(b) and (c))**

2. The work practice plan shall not become part of the facility's Renewable Operating Permit. Revisions to the work practice plan likewise do not represent revisions to the facility's Renewable Operating Permit. Copies of the current work practice plan and any earlier plan developed within the past five years are required to be made available for inspection and copying by the Air Quality Division upon request.[2] **(40 CFR 63.3094)**

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

Add-On Control Device:	**Operating Limit:**
Thermal Oxidizer	The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3167(a).
Concentrators, Including Zeolite Wheels Rotary Carbon Adsorbers and Fluidized Carbon Concentrators	The average desorption gas inlet temperature in any 3-hour period must not fall below the limit established according to 40 CFR 63.3167(e).

4. The permittee shall develop and implement a written startup, shutdown and malfunction plan (SSMP) in accordance with 40 CFR 63.6(e)(3). This plan must address the startup, shutdown and corrective actions in the event of a malfunction of any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends. The SSMP must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.[2] **(40 CFR 63.3100(f))**

5. The permittee shall operate and maintain FG-AUTO-MACT including any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, according to the provisions in 40 CFR 63.6(e)(1)(i).[2] **(40 CFR 63.3100(d))**

6. The permittee shall maintain a log detailing the operation and maintenance of any emission capture system, add-on control device, or continuous parameter monitor upon which compliance with any of the emission limits in SC I.1 through 4 depends. The log shall cover the period between the compliance date specified in 40 CFR 63.3083 and the date when the initial emission capture system and add-on control device performance tests have been completed, as specified in 40 CFR 63.3160.[2] **(40 CFR 63.3100(e))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The permittee shall perform the applicable performance tests and compliance demonstrations in accordance with 40 CFR 63.3150-3152, 40 CFR 63.3160-3161, 40 CFR 63.3163-3168, 40 CFR 63.3170-3171, and 40 CFR 63.3173.[2] **(40 CFR Part 63, Subpart IIII)**

2. The permittee may rely upon the results of capture, destruction or transfer efficiency tests that have been previously conducted upon written approval from the AQD District Supervisor. Any such previous tests must meet the criteria identified in 40 CFR 63.3160(c)(1) through (3).[2] **(40 CFR 63.3160)**

3. The permittee shall determine the mass fraction of each organic HAP for each material used according to the procedures established under 40 CFR 63.3151(a)(1) through (5). The permittee may use USEPA Method ALT-017 as an alternative for any material used, after demonstrating that its use as an alternative test methodology for that material, has been approved by the USEPA pursuant to the requirements of 40 CFR 63.3151(a)(3) and 40 CFR 63.7.[2] **(40 CFR 63.7, 40 CFR 63.3151)**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall compile all required records and complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the end of the calendar month following each compliance period unless otherwise specified in any monitoring/recordkeeping condition.[2] **(R 336.1213(3))**

2. The permittee shall conduct an initial compliance demonstration for the initial compliance period described in 40 CFR 63.3150-3151, 40 CFR 63.3160-3161, and 40 CFR 63.3170-3171. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3083 and ends on the last day of the month following the compliance date. If the initial date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next month.[2] **(40 CFR 63.3150, 40 CFR 63.3160, 40 CFR 63.3170, 40 CFR 63.3083(a) and (b))**

3. The permittee shall install, operate and maintain each continuous parametric monitoring system in accordance with the applicable provisions of 40 CFR 63.3168.[2] **(40 CFR 63.3168)**

4. The permittee shall keep all records as required by 40 CFR 63.3130 in the format and timeframes outlined in 40 CFR 63.3131.[2] **(40 CFR 63.3130, 40 CFR 63.3131)**

5. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date:
   a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart IIII and the documentation supporting each notification and report as specified in 40 CFR 63.3130(a).[2] (**40 CFR 63.3130(a))**

   b. A current copy of information provided by materials suppliers or manufactures, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP for each coating, thinner and cleaning material, the density for each coating and thinner, and the volume fraction of coating solids for each coating. **(40 CFR 63.3130(b))**

   c. Monthly records of the following:
      i. For each coating or thinner used in FG-AUTO-MACT, the volume used in each month, the mass fraction organic HAP content, the density, and the volume fraction of solids. **(40 CFR 63.3130(c))**
      ii. For each material used in EU-DEADENER and EU-SEALERS, the mass used in each month and the mass organic HAP content. **(40 CFR 63.3130(c))**

iii. Calculations of the organic HAP emission rate for FG-AUTO-MACT in pounds per gallon of applied coating solids. If permittee chooses to comply with the option identified in SC I.5.a., a record of the weight fraction of each organic HAP in each material added to EU-ECOAT. These calculations and records must include all raw data, algorithms, and intermediate calculations. If the ''Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations,'' EPA–453/R–08–002, is used, all data input to this must be recorded. If these data are maintained as electronic files, the electronic files, as well as any paper copies must be maintained. **(40 CFR 63.3130(c), 40 CFR 63.3163, 40 CFR 63.3173)**

iv. Calculation of the average monthly mass organic HAP content in pounds per pound of coating, separately for EU-DEADENER and EU-SEALERS. **(40 CFR 63.3130(c), 40 CFR 63.3152)**

v. The name, volume, mass fraction organic HAP content and density of each cleaning material used. **(40 CFR 63.3130(d) - (f))**

d. Any additional records pertaining to deviations; startup, shutdown or malfunctions; emission capture systems; performance testing; capture and control efficiency determinations; transfer efficiency determinations; and work practice plans for any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, pursuant to 40 CFR 63.3130(g) through (n).[2] **(40 CFR 63.3130(g) – (n))**

e. Records pertaining to the design and operation of control and monitoring systems for any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends must be maintained on-site for the life of the equipment in a location readily available to plant operators and inspectors.[2] **(40 CFR 63.3130(o))**

6. The permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 to Subpart IIII of Part 63 for any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, pursuant to 40 CFR 63.3163 and 40 CFR 63.3173 using the method(s) described below:[2] **(40 CFR 63.3163, 40 CFR 63.3173 and Table 1)**

Add-On Control Device:	Operating Limit:	Continuous Compliance Demonstration Method
Thermal Oxidizer	The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3167(a).	a. Collect the combustion temperature data according to 40 CFR 63.3168(c); b. Reduce the data to 3-hour block averages; and c. Maintain the 3-hour average combustion temperature at or above temperature limit.
Concentrators, Including Zeolite Wheels Rotary Carbon Adsorbers and Fluidized Carbon Concentrators	The average desorption gas inlet temperature in any 3-hour period must not fall below the limit established according to 40 CFR 63.3167(e).	a. Collect the temperature data according to 40 CFR 63.3168(f); b. Reduce the data to 3-hour block averages; and c. Maintain the 3-hour average temperature at or above the temperature limit.

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

a. Flow control position indicator requirements pursuant to 40 CFR 63.3168(b)(1)(i);

b. Car-seal or lock-and-key valve closures requirements pursuant to 40 CFR 63.3168(b)(1)(ii);

c. Valve closure monitoring requirements pursuant to 40 CFR 63.3168(b)(1)(iii);

d. Automatic shutdown system requirements pursuant to 40 CFR 63.3168(b)(1)(iv).

If any bypass line is opened, a description of why the line was opened and the length of time it remained open must be included in the semi-annual compliance reports required in SC VII.1.[2] **(40 CFR 63.3168(b))**

VII. REPORTING

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

2. 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 all semiannual compliance reports as required by 40 CFR 63.3120(a). The first time period covered by these reports shall be shortened so as to end on either June 30 or December 31, whichever comes first. These reports shall be due March 15 for the reporting period July 1 to December 31 and September 15 for the reporting period January 1 to June 30.[2] **(40 CFR 63.3120(a))**

5. The permittee shall submit applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), as specified in 40 CFR 63.3110.[2] **(40 CFR Part 63, Subparts A and IIII)**

6. For any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, the permittee shall submit all performance test reports for emission capture systems and add-on control devices, and reports of transfer efficiency tests as required by 40 CFR 63.3120(b).[2] **(40 CFR 63.3120(b))**

7. For any emission capture system or add-on control device upon which compliance with any of the emission limits in SC I.1 through 4 depends, for which a startup, shutdown, or malfunction occurs during the semiannual reporting period, the permittee shall submit a SSMP report as specified in 40 CFR 63.3120(c).[2] **(40 CFR 63. 3120(c), 40 CFR 63.10(d))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart IIII for Surface Coating of Automobiles and Light Duty Trucks by the initial compliance date.[2] **(40 CFR Part 63, Subparts A and IIII)**

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).

FG-OLD-MACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The affected source is each new, reconstructed, or existing Organic Liquid Distribution (OLD) (non-gasoline) operation that is located at, or is part of a major source of hazardous air pollutant (HAP) emissions. The affected source is comprised of storage tanks, transfer racks, equipment leak components associated with storage tanks, transfer racks and pipelines, transport vehicles, and all containers while loading or unloading at transfer racks subject to this subpart. Equipment that is part of an affected source under another NESHAP is excluded from the affected source. **(40 CFR 63.2338(c))**

Emission Unit: EU-METHANOLTANK. These conditions specifically cover existing (construction pre dates April 2, 2002) liquid storage tanks which hold more than 5,000 gallons but less than 50,000 gallons and/or new liquid storage tanks which hold more than 5,000 gallons but less than 10,000 gallons of methanol/windshield washer fill solvents that are dispensed to newly assembled vehicles.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. For each existing storage tank with a capacity greater than 5,000 gallons but less than 50,000 gallons, the permittee shall comply with the requirements of 63.2343(b).[2] **(40 CFR 63.2343(b))**

2. For each new storage tank with a capacity greater than 5,000 gallons but less than 10,000 gallons, the permittee shall comply with the requirements of 63.2343(b).[2] **(40 CFR 63.2343(b))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep documentation, including a record of the annual average true vapor pressure of the total Table 1 Organic liquid, that verifies the storage tank is not required to be controlled under this subpart. The documentation shall be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review.[2] **(63.2343(b)(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 shall submit the following information in either the Notification of Compliance Status, according to the schedule in Table 12 to this subpart, or in your first Compliance report according to the schedule in 63.2386(b), whichever occurs first.[2] **(63.2343(b)(1))**

   a. Company name and address.
   b. A statement by a responsible official, including the official's name, title and signature, certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete.
   c. Date of report and beginning and ending dates of the reporting period.
   d. A list of all storage tanks greater than 5,000 gallons that are part of the affected source but not subject to any of the emission limitations, operating limits, or work practice standards of this subpart.

5. The permittee shall submit subsequent compliance reports according to the schedule in 63.2386(b) or in conjunction with the reporting requirements in this ROP whenever any of the following events occur as applicable:[2] **(63.2343(b)(2))**

   a. Any storage tank became subject to control under this subpart EEEE.
   b. Any storage tank greater than 5,000 gallons became part of the affected source, but is not subject to any emission limitations, operating limits or work practice standards of this subpart.

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart EEEE as they apply to FG-OLD. The permittee may choose an alternative compliance method not listed in FG-OLD by providing the appropriate notifications required under 40 CFR 63.9(j), maintaining a log required by 40 CFR 70.6(a)(9), and by complying with all applicable provisions required by Subpart EEEE for the compliance option chosen.[2] **(40 CFR Part 70.6(a)(9), 40 CFR Part 63.9(j), 40 CFR Part 63, Subparts A and EEEE)**

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).

FG-COLDCLEANERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EU-COLDCLEANER

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(h))**

   b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**

2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**

3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**

5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees fahrenheit, then the cold cleaner must comply with at least one of the following provisions:

a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**

b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**

c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 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(h).

   d. The applicable Rule 201 exemption.

   e. The Reid vapor pressure of each solvent used.

   f. If applicable, the option chosen to comply with Rule 707(2).

3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**

4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, can evaporate into the atmosphere shall be made monthly. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. ANOTHER REQUIREMENT(S)

NA

FG-RULE 287(c)
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EU-RULE287(c), EU-MAINTENANCE_BOOTH

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time/ Operating Scenario	Equipment	Underlying Applicable Requirement
1. Coatings	200 gallons	Per month, as applied, minus water, per emission unit	NA	**R 336.1287(c)(i)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DNRE, AQD Rule 287(c), Permit to Install Exemption Record form (EQP 3562) or an alternative format that is approved by the AQD District Supervisor. **(R 336.1213(3))**

   a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(c)(iii))**

   b. Documentation of any filter replacements for exhaust systems serving coating spray equipment. **(R 336.1213(3))**

See Appendix 4

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. ANOTHER REQUIREMENT(S)

NA

FG-RULE290
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EU-RULE290

POLLUTION CONTROL EQUIPMENT
NA

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(i))**

2. Each emission unit that the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(a)(ii))**

   a. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 1,000 or 500 pounds per month, respectively. **(R 336.1290(a)(ii)(A))**

   b. For noncarcinogenic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 microgram per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(B))**

   c. For carcinogenic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(a)(ii)(C))**

   d. The emission unit shall not emit any air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(a)(ii)(D))**

3. Each emission unit that emits only noncarcinogenic particulate air contaminants and other air contaminants that are exempted under Rule 290(a)(i) and/or Rule 290(a)(ii), if all of the following provisions are met: (**R 336.1290(a)(iii))**

   a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than

or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have an exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(a)(iii)(A))**

b. The visible emissions from the emission unit are not more than five percent opacity in accordance with the methods contained in Rule 303. **(R 336.1290(a)(iii)(B))**

c. The initial threshold screening level for each particulate air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the DEQ, AQD Rule 290, Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**

   a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**

   b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**

   c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**

   d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(a)(ii) and (iii). **(R 336.1213(3))**

   e. Material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in sufficient detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. **(R 336.1213(3), R 336.1290(c))**

2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**

   a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(b), R 336.1213(3))**

b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate**. (R 336.1213(3))**

3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4

VII. REPORTING

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

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

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

~~FCA US, LLC~~
~~JEFFERSON NORTH ASSEMBLY PLANT~~
~~ROP No: MI-ROP-N2155-2017~~
~~Expiration Date: JUNE 9, 2022~~
~~PTI No: MI-PTI-N2155-2017~~

FG-BOILER-MACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This Flexible Group establishes the national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP as found in 40 CFR Subpart DDDDD.

Emission Units: EU-BOILER1, EU-BOILER2, EU-BOILER3 and EU-BOILER4

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall conduct the initial tune-up of the Boilers 1, 2 3 & 4 no later than January 31, 2016, and every five years (no more than 61 months after the previous tune-up) thereafter to demonstrate continuous compliance as specified in 40 CFR 63.7540(a)(10)(i) through (a)(10)(vi). **(40 CFR 63.7510(e), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(12))**

2. For an existing boiler or process heater located at a major source facility, not including limited use units, the permittee must have a one-time energy assessment performed by a qualified energy assessor as required in Table 3 of 40 CRF Part 63, Subpart DDDDD. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. **(40 CFR Part 63, Subpart DDDDD, Table 3)**

3. The permittee, at all times, 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. Determination of whether such operation and maintenance procedures are being used will be based on information available to the administrator that 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 63.7500(a)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

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

2. Semi-annual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(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 compliance reports as required by 40 CFR 63.7550. The first time period covered by these reports shall be shortened so as to end on either June 30 or December 31, whichever date is the first date that occurs at least 180 days (or 1, 2, or 5 years, as applicable, if submitting an annual, biennial, or 5 year compliance report) after the compliance date that is specified for you source in 40 CFR 63.7495. **(40 CFR 63.7550)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of 40 CFR Part 63, Subpart DDDDD. **(40 CFR Part 63, Subpart DDDDD)**

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).

FG-CI-RICE-MACT
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 RICE less than 500 bhp.

Emission Units: ~~EU-ENG-EFP AND~~ EU-ENG-WFP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each engine in FG-CI-RICE-MACT shall be installed, maintained, and operated in a satisfactory manner. A list of work practice standards as specified in 40 CFR 63.6602 and Table 2c, Item 1 or the permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices. The following are the work practices specified in 40 CFR Part 63 Subpart ZZZZ Table 2c:

   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 work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work 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 work 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, Item 1)**

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c of 40 CFR Part 63 Subpart ZZZZ. **(40 CFR 63.6625(j))**

3. The permittee shall install, maintain and operate each engine in FG-CI-RICE-MACT and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own 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))**

4. The permittee shall minimize the time spent at idle during startup and minimize the startup time of each engine in FG-CI-RICE-MACT 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 shall not allow each engine in FG-CI-RICE-MACT to exceed 100 hours per calendar year for maintenance checks and readiness testing and emergency demand response. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but 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 RICE beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2)(i))**

6. The permittee may operate each engine in FG-CI-RICE-MACT up to 50 hours per calendar year for non-emergency situations, but those hours are to be counted towards the 100 hours per calendar year for maintenance and testing and emergency demand response, as allowed in 40 CFR 63.6640(f)(2). **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a non-resettable hour meter on each engine in FG-CI-RICE-MACT **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 in order to extend the specified oil change requirement in 40 CFR Subpart ZZZZ Table 2c, 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: The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator 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 engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator 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(j))**

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

1. For each engine in FG-CI-RICE-MACT 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)**

2. For each engine in FG-CI-RICE-MACT the permittee shall keep in a satisfactory manner, records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(f), 40 CFR 63.6660)**

VII. REPORTING

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

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

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

4. Each affected source that has obtained a Title V Renewable Operating Permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in Subpart ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of Subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in Subpart ZZZZ, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. **(40 CFR 63.6650(f))**

5. If you own or operate an emergency stationary RICE with a site rating of more than 100 brake hp that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in §63.6640(f)(4)(ii), you must submit an annual report according to the requirements below and as specified in 40 CFR 63.6650(h):
   a. The report must contain the following information:
      i. Company name and address where the engine is located.
      ii. Date of the report and beginning and ending dates of the reporting period.
      iii. Engine site rating and model year.
      iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
      v. Hours operated for the purposes specified in §63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(2)(ii) and (iii).
      vi. Number of hours the engine is contractually obligated to be available for the purposes specified in §63.6640(f)(2)(ii) and (iii).

vii. Hours spent for operation for the purpose specified in §63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

viii. If there were no deviations from the fuel requirements in §63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.

ix. If there were deviations from the fuel requirements in §63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.

b. The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

c. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in §63.13**. (40 CFR 63.6650(h), 40 CFR 63.6660)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date. **(40 CFR 63.6595, 40 CFR Part 63, Subparts A and ZZZZ)**

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).

FG-CI-RICE-NEW
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

One (1) 370 HP diesel -fired emergency fire pump with model year of 2011 or later and a displacement of <30 liters/cylinder.

40 CFR Part 60, Subpart IIII – New Source Performance Standards, for, new emergency, compression ignition (CI) reciprocating internal combustion engine (RICE), that has a maximum site rating of less than 500 brake hp. The emergency engine is for the east fire pump that is located at a major source of HAP emissions.

Emission Unit: EU-ENG-EFP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NMHC[H]+NOx	3.0 g/bhp-hr[I]	Hourly	EU-ENG-EFP	SC V.1, SC V.2, SC VI.2, SC VI.3	40 CFR 60.4205(c), Table 4 of 40 CFR Part 60, Subpart IIII
2. CO	2.6 g/bhp-hr[I]	Hourly	EU-ENG-EFP	SC V.1, SC V.2, SC VI.2, SC VI.3	40 CFR 60.4205(c), Table 4 of 40 CFR Part 60, Subpart IIII
3. PM	0.15 g/bhp-hr[I]	Hourly	EU-ENG-EFP	SC V.1, SC V.2, SC VI.2, SC VI.3	R 336.1331(1)(c), 40 CFR 60.4205(c), Table 4 of 40 CFR Part 60, Subpart IIII

[H] NMHC = nonmethane hydrocarbon
[I] These emission limits are for certified engines; if testing becomes required to demonstrate compliance, then the tested values must be compared to the Not to Exceed (NTE) requirements determined through 40 CFR 60.4212(c).

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in FG-CI-RICE-NEW with a maximum sulfur content of 15 ppm (0.0015 percent) by weight, and a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. **(40 CFR 60.4207(b), 40 CFR 80.510(b))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee may operate each EU in FG-CI-RICE-NEW 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 organizationor 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 formaintenance 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. Each EU in FG-CI-RICE-NEW may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or demand response, or to generate income for the permittee to supply non-emergency poweras part of a financial arrangement with another entity. **(40 CFR 60.4211(f))**

2. If the permittee purchased a certified engine, according to procedures specified in 40 CFR Part 60, Subpart IIII, for the same model year and maximum engine power, the permittee shall meet the following requirements for each respective EU in FG-CI-RICE-NEW:
   a) Operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions.
   b) Change only those emission-related settings that are permitted by the manufacturer.
   c) Meet the requirements as specified in 40 CFR 89, 94, and/or 1068, as they apply to each respective EU in FG-CI-RICE-NEW.

   If the permittee does not operate and maintain the certified engine and control device according to the manufacturer's emission-related written instructions, the engine may be considered a non-certified engine. **(40 CFR 60.4211(a) & (c))**

3. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, thepermittee shall keep a maintenance plan for each respective EU in FG-CI-RICE-NEW and shall, to the extent practicable, maintain and operate engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4211(g)(2)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each EU in FG-CI-RICE-NEW with a non-resettable hours meter to trackthe operating hours. **(40 CFR 52.21(c) & (d), 40 CFR 60.4209(a))**

2. The maximum NFPA nameplate engine power of each EU in FG-CI-RICE-NEW shall not exceed 350 brake HP. **(Table 4 of 40 CFR Part 60, Subpart IIII)**

V. TESTING/SAMPLING

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

1. If any EU in FG-CI-RICE-NEW is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in

a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:

a) Conduct an initial performance test to demonstrate compliance with the applicable emission standards within one year of startup, or within one year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within one year after you change emission-related settings in a way that is not permitted by the manufacturer.

b) If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212.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. **(40 CFR 60.4211(g)(2), 40 CFR 60.4212)**

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 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(40 CFR 60.4211, 40 CFR 60.4214)**

2. The permittee shall keep, in a satisfactory manner, the following records for each EU in FG-CI-RICE-NEW:
   a) For certified engine: The permittee shall keep records of the manufacturer certification documentation.
   b) For uncertified engine: The permittee shall keep records of testing required in SC V.1.

   The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4211)

3. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for each EUin FG-CI-RICE-NEW:
   a) For certified engine: The permittee shall keep records of the manufacturer's emission-related written instructions, and records demonstrating that the engine has been maintained according to those instructions, as specified in SC III.3.
   b) For uncertified engine: The permittee shall keep records of a maintenance plan, as required by SC III.4, and maintenance activities.

   The permittee shall keep all records on file and make them available to the Department upon request. (40 CFR 60.4211)

4. The permittee shall monitor and record the total hours of operation and the hours of operation during non-emergencies for each EU in FG-CI-RICE-NEW, on a monthly and 12-month rolling time period basis, in a manneracceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation of each EU in FG-CI-RICE-NEW, including what classified the operation as emergency. **(40 CFR 60.4211, 40 CFR 60.4214)**

5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in each EU in FG-CI-RICE-NEW, demonstrating that the fuel meets

the requirement of 40 CFR 80.510(b), as specified in SC II.1. The certification or test data shall include the nameof the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. **(40 CFR 60.4207(b), 40 CFR 80.510(b))**

VII. REPORTING

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

2. Semi-annual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (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))

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart IIII, as they apply to each EU in FG-CI-RICE-NEW. **(40 CFR Part 60, Subparts A & IIII, 40 CFR 63.6590)**

2. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ, as they apply to each EU in FG-CI-RICE-NEW. In accordance with 40 CFR 63.6590(c)(6), a new or reconstructed emergency stationary RICE with a site rating of less than or equal to 500 HP located at a major source of HAP emissions meets therequirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII. **(40 CFR Part 63 Subparts A and ZZZZ, 40 CFR 63.6590)**

Footnotes:

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

E. NON-APPLICABLE REQUIREMENTS

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

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

APPENDICES

Appendix 1. Abbreviations and Acronyms

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_2e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
		gr	Grains
EU	Emission Unit	HAP	Hazardous Air Pollutant
FG	Flexible Group	Hg	Mercury
GACS	Gallons of Applied Coating Solids	hr	Hour
GC	General Condition	HP	Horsepower
GHGs	Greenhouse Gases	H_2S	Hydrogen Sulfide
HVLP	High Volume Low Pressure*	kW	Kilowatt
ID	Identification	lb	Pound
IRSL	Initial Risk Screening Level	m	Meter
ITSL	Initial Threshold Screening Level	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds
MDEQ	Michigan Department of Environmental Quality	NO_x	Oxides of Nitrogen
		ng	Nanogram
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NA	Not Applicable	PM10	Particulate Matter equal to or less than 10 microns in diameter
NAAQS	National Ambient Air Quality Standards		
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonable Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO_2	Sulfur Dioxide
SCR	Selective Catalytic Reduction	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
		µm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

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

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

~~The following~~Specific monitoring procedures, methods, or specifications are ~~the details to the monitoring requirements identified and referenced in FG-FACILITY and FG-CONTROLS.~~detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

~~**Elements of an O & MCAM Plan**~~

~~**General** – Keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for each respective add-on control device used to demonstrate compliance with applicable VOC emissions limits.~~

~~**Thermal Oxidizers**~~

~~1. Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.~~

~~2. Perform a heat exchanger visual internal inspection a minimum of once every 18 months.*~~

~~**Regenerative Thermal Oxidizers**~~

~~1. Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.~~

~~2. Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months.*~~

~~3. Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months.*~~

~~**VOC Concentrator**~~

~~1. Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.~~

~~2. Perform internal observation of adsorbent materials for contamination and erosion a minimum of once every 18 months.*~~

~~3. Observe and record the pressure drop across the concentrator a minimum of once every calendar quarter.~~

* The requirement to address this issue is satisfied if a performance test (i.e., stack test) has been performed on the control device within the prior 18 month period.

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

By August 1, 2019, the permittee shall provide a proposal for updating the established percentage "split" of EU-ECoat's VOC emissions from the dip tank versus the curing oven which is acceptable to the AQD District Supervisor. The proposal will include a schedule for completing the analysis and employing its results by August 1, 2021. The proposal may consist of stack testing, sampling, laboratory testing, engineering analysis, evaluations performed for other assembly plant facilities or some combination of these or additional methods that are acceptable to the AQD District Supervisor.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N2155-2008. 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-N2155-2008 is being reissued as Source-Wide PTI No. MI-PTI-N2155-2017.

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. Emission Calculations

The permittee shall use the calculations and methodologies in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in US EPA Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light Duty Trucks (September 2008, EPA-453/R-08-002)for EU-Guidecoat and EU-Topcoat.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of

the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

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