

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

EFFECTIVE DATE: March 16, 2023

ISSUED TO

Toefco Engineered Coating Systems, Inc.

State Registration Number (SRN): N2610

LOCATED AT

1220 North 14th Street, Niles, Berrien County, Michigan 49120

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N2610-2023

Expiration Date: March 16, 2028

Administratively Complete ROP Renewal Application Due
Between September 16, 2026 and September 16, 2027

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N2610-2023

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

Michigan Department of Environment, Great Lakes, and Energy

Monica Brothers, Acting Kalamazoo 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 Environment, Great Lakes, and Energy (EGLE) or his or her designee.

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

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

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

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

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 state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - 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(9))**

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE DEFINITIONS

Job: A group of parts for a customer job order.

Customer Job Order: A customer's order for the Facility to process specific parts in a particular manner.

Batch: A group of parts the Facility places in either a curing oven or a burn-off oven at any one time.

A job may consist of more than one batch, and a batch may consist of more than one job.

SOURCE-WIDE CONDITIONS

DESCRIPTION

All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	30.0 tpy ²	12-month rolling time period as determined at the end of each calendar month.	SOURCE-WIDE	SC VI.1 SC VI.2	R 336.1225 R 336.1702

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 336.1213(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))

- The permittee shall keep VOC mass emission calculations, on a monthly basis for SOURCE-WIDE determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month, for all coating lines and associated purge and clean-up operation at the source. The permittee shall keep all records in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.² (R 336.1225, R 336.1702)
- 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.² (R 336.1225, R 336.1702)

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee 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 M for Surface Coating of Miscellaneous Metal Parts and Products by the initial compliance date. **(40 CFR Part 63, Subparts A and M)**

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).

C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-OVEN1-1	Bldg #1, Precision Quincy 12552 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN2	Bldg #1, Michigan 2878-H curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN3-1	Bldg #1, Precision Quincy 12251 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN4	Bldg #1, Blue M EB536 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN5	Bldg #1, Blue M 123 curing oven, electric oven	01-01-1994	FG-CUREOVENS
EU-OVEN6	Bldg #1, Precision Quincy 650 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN7	Bldg #1, Blue M 1235 curing oven, electric oven	01-01-1994	FG-CUREOVENS
EU-OVEN9-Yellow	Bldg #2, Yellow line curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN10	Bldg #1, Precision Quincy 13174 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN11	Bldg #1, Mahon 16994 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN12	Bldg #1, Despatch 70507 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN13	Bldg #1, Precision Quincy 26172 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN14-Green	Bldg #2, Green line curing oven (Paashe)	01-01-1994	FG-CUREOVENS
EU-OVEN15-Blue	Bldg #2, Blue line curing oven (Paashe)	01-01-1994	FG-CUREOVENS
EU-OVEN18	Bldg #3, North line Jensen 4587 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN19	Bldg #1, Precision Quincy 10496 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN20	Bldg #1, Blue M P12-2100 curing oven (Gerref)	01-01-1994	FG-CUREOVENS
EU-OVEN21	Bldg #4, Despatch 106487 curing oven, small electric oven	01-01-1994	FG-CUREOVENS
EU-OVEN23-Gerref	Bldg #4, Gerref 821691 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN24	Bldg #4, Jensen 6502 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN25	Bldg #4, Precision Quincy 13163 curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN26	Bldg #3, Filco E400 040900003C curing oven	01-01-1994	FG-CUREOVENS
EU-OVEN16-LBayco	Bldg #3, Large Bayco burn-off oven	01-01-1994	FG-BURNOFFOVENS
EU-SB7-Green	Bldg #2, Green line spray booth; green chain-on-edge coating line	01-01-1994	FG-GENERALPERMIT FG-MACT MMMM
EU-SB8-Blue	Bldg #2, Blue line spray booth; blue chain-on-edge coating line	01-01-1994	FG-GENERALPERMIT FG-MACT MMMM
EU-SB9-Yellow	Bldg #2, Yellow line spray booth; yellow chain-on-edge coating line	01-01-1994	FG-GENERALPERMIT FG-MACT MMMM
EU-SB10-North	Bldg #3, North line wet spray booth; north coating line	01-01-1994	FG-GENERALPERMIT FG-MACT MMMM
EU-ORINGCOAT1	O-ring coating machine	02-02-2009	FG-RULE287(2)(c) FG-MACT MMMM

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-ORINGCOAT2	O-ring coating machine	02-02-2009	FG-RULE287(2)(c) FG-MACT MMMM
EU-ORINGCOAT3	O-ring coating machine	11-09-2009	FG-RULE287(2)(c) FG-MACT MMMM
EU-ORINGCOAT4	O-ring coating machine	11-09-2009	FG-RULE287(2)(c) FG-MACT MMMM
EU-QUADCTR	Quadrant coating machine for coating O-ring seals	12-14-2007	FG-RULE287(2)(c) FG-MACT MMMM
EU-SB1	Bldg #1, spray booth – R287(2)(c)	01-01-1994	FG-RULE287(2)(c) FG-MACT MMMM
EU-SB2	Bldg #1, spray booth – R287(2)(c), next to EU-OVEN2 and EU-OVEN6	01-01-1994	FG-RULE287(2)(c) FG-MACT MMMM
EU-SB3	Bldg #1, spray booth – R287(2)(c), next to EU-OVEN1 and EU-OVEN3-1	01-01-1994	FG-RULE287(2)(c) FG-MACT MMMM
EU-SB4	Bldg #1, spray booth – R287(2)(c), next to EU-SB3 and EU-OVEN11	01-01-1994	FG-RULE287(2)(c) FG-MACT MMMM
EU-SB5	Bldg #1, spray booth – R287(2)(c), next to EU-OVEN10 and EU-OVEN12	01-01-1994	FG-RULE287(2)(c) FG-MACT MMMM
EU-SB6	Bldg #1, spray booth – R287(2)(c)	01-01-1994	FG-RULE287(2)(c) FG-MACT MMMM
EU-SB15	Bldg #4, spray booth – R287(2)(c), next to EU-OVEN25	01-01-1994	FG-RULE287(2)(c) FG-MACT MMMM
EU-SB16	Bldg #4, spray booth – R287(2)(c), west of Superline	01-01-1994	FG-RULE287(2)(c) FG-MACT MMMM
EU-SB17	Bldg #4, grate line topcoat spray booth – R287(2)(c)	01-01-1994	FG-RULE287(2)(c) FG-MACT MMMM
EU-SB18	Bldg #4, spray booth – R287(2)(c), next to EU-OVEN24	01-01-1994	FG-RULE287(2)(c) FG-MACT MMMM
EU-METALCOAT	A miscellaneous metal parts coating line that the Facility refers to as the “Superline.” The line consists of a three-stage pretreatment washer, a dry-off oven, two paint spray booths, two flash-off areas, and a curing oven.	04-07-2005 07-19-2007 06-30-2012 03-03-2014 03-17-2016	FG-MACT MMMM
EU-COLDCLEANER	Maintenance shop, free-standing cold cleaner	01-01-1994	FG-COLDCLEANERS
EU-SPRAYCLEANER	55-gallon drum-style spray gun cleaning system in the Superline area	07-19-2004	FG-COLDCLEANERS

**EU-METALCOAT
 EMISSION UNIT CONDITIONS**

DESCRIPTION

A miscellaneous metal parts coating line that the Facility refers to as the “Superline.” The line consists of a three-stage pretreatment washer, a dry-off oven, two paint spray booths, two flash-off areas, and a curing oven.

Flexible Group ID: FG-MACT MMMM

POLLUTION CONTROL EQUIPMENT

The two spray booths are equipped with dry filters to control particulate overspray. The VOC emissions from this line will be controlled by an RTO except during exceptional operation that is identified in this permit as “by-pass mode.”

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	18.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	EU-METALCOAT	SC VI.3	R 336.1702(a)
2. Xylene (CAS No. 1330-20-7)	62.9 lb/day ¹	Calendar day	EU-METALCOAT	SC VI.4	R 336.1225(1)
3. Ethylbenzene (CAS No. 100-41-4)	2.8 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EU-METALCOAT	SC VI.5	R 336.1225(3)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coatings	3.5 lb VOC/gal (minus water) ^a as applied during RTO by-pass mode only ²	Instantaneous	EU-METALCOAT	SC V.1	R 336.1702(a)

^aThe phrase “minus water” shall also include compounds which are used as organic solvents, and which are excluded from the definition of volatile organic compound. **(R 336.1602(4))**

2. The permittee shall not use the dry-off oven and/or the curing oven portions of EU-METALCOAT as a burn-off oven.¹ **(R 336.1901)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall recover and reclaim, recycle, or dispose of all coatings, reducers, thinners, additives, catalysts, and purge and cleanup solvents, etc. (materials), in accordance with all applicable regulations.² **(R 336.1702(a))**

2. The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1224, R 336.1225, R 336.1702(a))**
3. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.² **(R 336.1224, R 336.1370)**
4. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents, and thinners in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1225, R 336.1702(a))**
5. The permittee shall not operate the RTO unless a malfunction abatement plan (MAP) as described in Rule 911(2) is implemented and maintained. 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.
 - d. A description of the procedures to capture, handle, and dispose of all materials to minimize the generation of fugitive emissions per SC III.1, III.2, and III.4.

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 AQD 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.² **(R 336.1702(a), R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate each paint booth portion of EU-METALCOAT unless the respective exhaust filters are installed and operating in a satisfactory manner.² **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain each paint booth portion of EU-METALCOAT with HVLP spray guns or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702(a))**
3. The permittee shall not operate EU-METALCOAT unless the RTO is installed, maintained, and operated in a satisfactory manner, except during use of by-pass mode. Satisfactory operation of the RTO includes a minimum VOC capture efficiency of 60 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight) or a maximum VOC emission rate of 0.26 pph, and maintaining a minimum combustion chamber temperature of 1450°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, the permittee may use an average temperature of 1450°F based upon a three-hour rolling average.² **(R 336.1225, R 336.1702(a), R 336.1910)**
4. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis, during operation of the RTO.² **(R 336.1702(a))**

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content, and density of any material as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1225, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**
2. Verification of the destruction efficiency of the RTO by testing at the owner's expense, in accordance with Department requirements, may be required. 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. Verification of the destruction efficiency 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.² **(R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**
3. Verification of the capture efficiency of EU-METALCOAT by testing at the owner's expense, in accordance with Department requirements, may be required. 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. Verification of the capture efficiency 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.² **(R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004)**
4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1225, R 336.1702)**
2. 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.² **(R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a monthly basis for the EU-METALCOAT:
 - a. Operation mode: Normal operation or use of by-pass mode with the reason for not using the RTO (*e.g.*, use of corrosive material, such as chloride and fluoride containing compounds, and verified with Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor).
 - b. Gallons (with water) of each material used and reclaimed.
 - c. VOC content (minus water and with water) of each material as applied.
 - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1702)**

4. The permittee shall keep the following information on a daily basis for the EU-METALCOAT:
 - a. Gallons (with water) of each Xylene (CAS No. 1330-20-7) containing material used.
 - b. Where applicable, the gallons (with water) of each Xylene (CAS No. 1330-20-7) containing material reclaimed.
 - c. The Xylene (CAS No. 1330-20-7) content in pounds per gallon of each material used.
 - d. Xylene (CAS No. 1330-20-7) mass emission calculations determining the daily emission rate in pounds per day.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹
(R 336.1225(1))

5. The permittee shall keep the following information on a monthly basis for the EU-METALCOAT:
 - a. Gallons (with water) of each Ethylbenzene (CAS No. 100-41-4) containing material used.
 - b. Where applicable, the gallons (with water) of each Ethylbenzene (CAS No. 100-41-4) containing material reclaimed.
 - c. The Ethylbenzene (CAS No. 100-41-4) content in pounds per gallon of each material used.
 - d. Ethylbenzene (CAS No. 100-41-4) mass emission calculations determining the monthly emission rate in tons per calendar month.
 - e. Ethylbenzene (CAS No. 100-41-4) mass emission calculations determining the monthly emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹
(R 336.1225(3))

6. The permittee shall keep, in a satisfactory manner, operating temperature records for the RTO as required by SC IV.3, during operation of the RTO. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. If the measured operating temperature of the RTO falls below 1450°F during operation of the RTO, the permittee may demonstrate compliance based upon a three-hour average temperature, by calculating the average operating temperature for each three-hour period which includes one or more temperature readings below 1450°F. The permittee shall keep all records and calculations on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a))**

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-PSB1*	24 ²	28.9 ²	R 336.1225, 40 CFR 52.21(c) and (d)
2. SV-PSB2*	24 ²	28.9 ²	R 336.1225, 40 CFR 52.21(c) and (d)
3. SV-CO* (Curing Oven)	11 ²	25.5 ²	R 336.1225, 40 CFR 52.21(c) and (d)
4. SV-RTO	42 ²	30.0 ²	R 336.1225, 40 CFR 52.21(c) and (d)

*By-pass Mode Only

IX. OTHER REQUIREMENT(S)

1. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The notification shall be submitted to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal.¹ **(R 336.1225(4))**
2. 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 Mmmm for Surface Coating of Miscellaneous Metal Parts and Products, as they apply to EU-METALCOAT.² **(40 CFR Part 63, Subpart Mmmm)**

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 SPECIAL CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-CUREOVENS	Twenty-two (22) cure ovens	EU-OVEN1-1 EU-OVEN2 EU-OVEN3-1 EU-OVEN4 EU-OVEN5 EU-OVEN6 EU-OVEN7 EU-OVEN9-Yellow EU-OVEN10 EU-OVEN11 EU-OVEN12 EU-OVEN13 EU-OVEN14-Green EU-OVEN15-Blue EU-OVEN18 EU-OVEN19 EU-OVEN20 EU-OVEN21 EU-OVEN23-Gerref EU-OVEN24 EU-OVEN25 EU-OVEN26 and all future cure ovens installed at the facility.
FG-BURNOFFOVENS	One (1) burn-off oven	EU-OVEN16-LBayco and all future burn-off ovens installed at the facility.
FG-GENERALPERMIT	Coating lines installed at the Facility under a General Permit emitting up to 10 tons per year of VOC. A coating line is an operation, which is a single series in a coating process, and is comprised of one or more coating applicators and any associated flash-off areas, drying areas, and ovens wherein one or more surface coatings are applied and subsequently dried or cured. Surface coating may include any paint, lacquer, varnish, adhesive, or other coating material applied on a surface. Surfaces include any substrate except cans, coils, large appliances, metal furniture, magnet wire, fabrics, paper, vinyl, flat wood paneling, or graphic arts lines.	EU-SB7-Green EU-SB8-Blue EU-SB9-Yellow EU-SB10-North

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-RULE287(2)(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278, 278a, and 287(2)(c).	EU-ORINGCOAT1 EU-ORINGCOAT2 EU-ORINGCOAT3 EU-ORINGCOAT4 EU-QUADCTR EU-SB1 EU-SB2 EU-SB3 EU-SB4 EU-SB5 EU-SB6 EU-SB15 EU-SB16 EU-SB17 EU-SB18
FG-MACT MMMM	Each new, reconstructed, and existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR Part 63, Subpart MMMM, 40 CFR 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating. 40 CFR Part 63, Subpart MMMM does not apply to surface coating or a coating operation that meets any of the criteria of 40 CFR 63.3881(c)(1) through (17).	EU-SB7-Green EU-SB8-Blue EU-SB9-Yellow EU-SB10-North EU-ORINGCOAT1 EU-ORINGCOAT2 EU-ORINGCOAT3 EU-ORINGCOAT4 EU-QUADCTR EU-SB1 EU-SB2 EU-SB3 EU-SB4 EU-SB5 EU-SB6 EU-SB15 EU-SB16 EU-SB17 EU-SB18 EU-METALCOAT
FG-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EU-COLDCLEANER EU-SPRAYCLEANER

**FG-CUREOVENS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Twenty-two (22) cure ovens.

Emission Units: EU-OVEN1-1, EU-OVEN2, EU-OVEN3-1, EU-OVEN4, EU-OVEN5, EU-OVEN6, EU-OVEN7, EU-OVEN9-Yellow, EU-OVEN10, EU-OVEN11, EU-OVEN12, EU-OVEN13, EU-OVEN14-Green, EU-OVEN15-Blue, EU-OVEN18, EU-OVEN19, EU-OVEN20, EU-OVEN21, EU-OVEN23-Gerref, EU-OVEN24, EU-OVEN25, EU-OVEN26, and all future cure ovens installed at the facility.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Opacity (Visible Emissions)	Not to exceed a six-minute average of 20% ² .	Hourly	FG-CUREOVENS	SC VI.1 SC VI.2	R 336.1205 R 336.1224 R 336.1225 R 336.1301 R 336.1901

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall display at each cure oven the Work Practice Standards attached as described in Appendix 10 for the computerized temperature control system (the "System").² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)
2. The permittee shall not operate any of the ovens as burn-off ovens.² (R 336.1224, R 336.1301, R 336.1331, R 336.1901, R 336.1910)
3. The permittee shall install and shall operate a computerized temperature control system (the "System") for all cure ovens and upon startup for any new ovens. The System shall meet all of the requirements listed in Appendix 9. After the System is installed and operating properly for all of the ovens, the permittee shall not operate a cure oven unless the System is installed and operating properly with respect to that oven.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)
4. The permittee shall operate a stack monitor to monitor emissions of particulate matter from EU-OVEN23. The permittee shall perform maintenance on the stack monitor, which shall consist of a semiannual Functional Check and an annual Manual Zero Procedure check according to the procedures listed in Appendix 9.² (R 336.1205, R 336.1224, R 336.1901)
5. Each cure oven shall be clearly labeled with its respective oven number.² (R 336.1201, R 336.1224, R 336.1901)

See Appendices 9 and 10

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. If any visible emission, as defined in R 336.1301, is observed from any of the cure ovens, the cause shall be immediately investigated and the corrective action plan in Appendix 3 shall be implemented.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1702(a), R 336.1901)**
2. The permittee shall perform a weekly non-certified visible emissions check when the cure ovens are operating. (The check shall be for not less than five minutes and can include several stacks at the same time.) A log of the visible emission checks shall be kept on file for five years and be made available to the Air Quality Division upon request. The log shall include the date and time of the check, the name of the person, the stacks checked, the result of the check and the actions taken if visible emissions are observed.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1901)**
3. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a circular chart temperature monitoring device on EU-OVEN23 to monitor and record the temperature on a continuous basis.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)**
4. The permittee shall keep, in a satisfactory manner, circular chart records of the temperature in EU-OVEN23. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)**
5. The permittee shall keep, in a satisfactory manner, a record of the maintenance and checks performed per Appendix 9 on the stack monitor.² **(R 336.1205, R 336.1224, R 336.1901)**
6. The permittee shall record and maintain operating records, in the form of System-generated Job Orders and Oven Data Reports, for the curing of parts in each cure oven. All parts processed in a cure oven shall be documented in a System-generated Job Order and an Oven Data Report:
 - A. Each system-generated job order shall include:
 1. A unique numeric identifier for the job (a "job order reference number").
 2. The date(s) on which the job was processed in the oven(s).
 3. For job(s) in which coatings are applied, the specific coating applied to the job.
 4. For jobs in which coatings are applied, the number of parts processed for the job.
 5. The oven(s) used for the job.
 6. The employee(s) who processed the job.
 7. The temperature(s) at which the parts were processed.
 8. The length of time for processing the parts.
 9. The customer name.

B. Each system-generated oven data report shall include:

1. The date(s) for curing the batch.
2. The start and finish times that the batch was in the oven(s).
3. The temperature at which the oven was set for curing the batch (the “set point”).
4. The actual temperature of the oven(s) at one-minute intervals, provided, however, that the actual temperature of the oven(s) shall be recorded at one-hour intervals when the oven burner is not firing.
5. For batches to which coatings are applied, the specific coating applied to the batch.
6. For EU-OVEN23, the data recorded from the stack monitor pursuant to FG-CUREOVENS, SC III.4. Such data shall be recorded at one-minute intervals, provided, however, that such data shall be recorded at one-hour intervals when the oven burner is not firing.
7. The job order reference number denoting (as appropriate for curing) the coating, the oven temperature(s), and the length of time the batch is to remain in the oven(s).
8. The oven in which the curing occurred.
9. The name of the supervisor or data technician who, through the use of the centralized computer, entered the set point temperature for the cure oven and the length of time that parts are in the cure oven.
10. The customer name.

The permittee shall keep these records on file for a period of five years and made available to the Air Quality Division upon request.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)

See Appendices 3 and 9

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)

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. EU-OVEN1-1	10 ²	19-7 ²	R 336.1901 40 CFR 52.21 (c) and (d)
2. EU-OVEN2	4 ²	23-6 ²	R 336.1901 40 CFR 52.21 (c) and (d)
3. EU-OVEN3-1	10 ²	18-4 ²	R 336.1901 40 CFR 52.21 (c) and (d)
4. EU-OVEN4	6 ²	24-0 ²	R 336.1901 40 CFR 52.21 (c) and (d)

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
5. EU-OVEN5	4 ²	24-6 ²	R 336.1901 40 CFR 52.21 (c) and (d)
6. EU-OVEN6	4 ²	20-0 ²	R 336.1901 40 CFR 52.21 (c) and (d)
7. EU-OVEN7	6 ²	24-6 ²	R 336.1901 40 CFR 52.21 (c) and (d)
8. EU-OVEN9-Yellow	8 ²	31-0 ²	R 336.1901 40 CFR 52.21 (c) and (d)
9. EU-OVEN10	8 ²	23-0 ²	R 336.1901 40 CFR 52.21 (c) and (d)
10. EU-OVEN11	6 ²	24-0 ²	R 336.1901 40 CFR 52.21 (c) and (d)
11. EU-OVEN12	7 ²	23-6 ²	R 336.1901 40 CFR 52.21 (c) and (d)
12. EU-OVEN13	6 ²	23-0 ²	R 336.1901 40 CFR 52.21 (c) and (d)
13. EU-OVEN14-Green	7 ²	21-6 ²	R 336.1901 40 CFR 52.21 (c) and (d)
14. EU-OVEN15-Blue	12 ²	24-0 ²	R 336.1901 40 CFR 52.21 (c) and (d)
15. EU-OVEN18	9 ²	26-6 ²	R 336.1901 40 CFR 52.21 (c) and (d)
16. EU-OVEN19	7 ²	30-6 ²	R 336.1901 40 CFR 52.21 (c) and (d)
17. EU-OVEN20	9x13 ²	21-0 ²	R 336.1901 40 CFR 52.21 (c) and (d)
18. EU-OVEN21	6 ²	22-0 ²	R 336.1901 40 CFR 52.21 (c) and (d)
19. EU-OVEN23	14 ²	32-0 ²	R 336.1901 40 CFR 52.21 (c) and (d)
20. EU-OVEN24	11 ²	24-4 ²	R 336.1901 40 CFR 52.21 (c) and (d)
21. EU-OVEN25	10 ²	20-5 ²	R 336.1901 40 CFR 52.21 (c) and (d)
22. EU-OVEN26	10.75 ²	29-6 ²	R 336.1901 40 CFR 52.21 (c) and (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).

**FG-BURNOFFOVENS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

One (1) burn-off oven

Emission Units: EU-OVEN16-LBayco and all future burn-off ovens installed at the facility.

POLLUTION CONTROL EQUIPMENT

Thermal Oxidizers

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Hydrogen Fluoride	363.5 mg per cubic meter corrected to 70 degrees Fahrenheit and 29.92 inches Hg. ¹	Hourly	EU-OVEN16-LBayco	SC V.1	R 336.1225 R 336.1901 R 336.1213(3)
2. Opacity (Visible Emissions)	Not to exceed a six-minute average of 20 percent opacity. ²	Hourly	EU-OVEN16-LBayco and all future ovens installed at the facility.	SC VI.1 SC VI.2	R 336.1205 R 336.1224 R 336.1225 R 336.1301 R 336.1901

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall install and operate a computerized temperature control system (the "System") for all burn-off ovens and upon startup of any new ovens. The System shall meet all of the requirements listed in Appendix 9. After the System is installed and operating properly for all of the ovens, the permittee shall not operate a burn-off oven unless the System is installed and operating properly with respect to that oven with respect to that oven.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)**
2. The permittee shall not operate any burn-off oven unless the thermal oxidizer is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. This condition shall not prevent the permittee from operating EU-OVEN16-LBayco at a temperature below 350 degrees Fahrenheit to boil off excess wash water or to dry water from parts and materials being processed by the permittee, without the use of the thermal oxidizer.² **(R 336.1225, R 336.1331, R 336.1702, R 336.1901)**
3. The permittee shall not remove fluorocarbons in more than one burn-off oven simultaneously.¹ **(R 336.1225 R 336.1901)**
4. Each burn-off oven shall be clearly labeled with its respective oven number.² **(R 336.1201, R 336.1224, R 336.1901)**

See Appendix 9

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 verify the hydrogen fluoride emission rates from EU-OVEN16-LBayco by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
2. The permittee shall verify the hydrogen fluoride emission rates EU-OVEN16-LBayco, at a minimum, every five years from the date of the last test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

1. If any visible emission, as defined in R 336.1301, is observed from any of the burn-off ovens, the cause shall be immediately investigated and the corrective action plan in Appendix 3 shall be implemented.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1702(a), R 336.1901)**
2. The permittee shall perform a weekly non-certified visible emissions check when the burn-off oven(s) is/are operating. (The check shall be for not less than five minutes and can include several stacks at the same time.) A log of the visible emission checks shall be kept on file for five years and be made available to the Air Quality Division upon request. The log shall include the date and time of the check, the name of the person, the stacks checked, the result of the check and the actions taken if visible emissions are observed.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1901)**
3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner circular chart temperature monitoring devices on EU-OVEN16-LBayco to monitor and record the oven and thermal oxidizer temperatures on a continuous basis.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)**
4. The permittee shall keep, in a satisfactory manner, circular chart records of the burn-off oven and thermal oxidizer temperatures in EU-OVEN16-LBayco. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.² **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)**
5. The permittee shall record and maintain System generated operating records, in the form of Job Orders and Oven Data Reports, for the burning off of parts in each burn-off oven:
 - A. Each System-generated Job Order shall include:
 1. A unique numeric identifier for the job (a "job order reference number").
 2. The date(s) on which the job was processed in the oven.
 3. The oven used for the job.

4. The employee(s) who processed the job.
 5. The temperature(s) at which the parts were processed.
 6. The length of time for processing the parts.
 7. The customer name.
- B. Each System-generated Oven Data Report shall include:
1. The date for burning off the batch.
 2. The start and finish times that the batch was in the oven.
 3. The temperature at which the oven was set for burning off the batch (the "set point").
 4. The actual temperature of the oven at one-minute intervals; however, the actual temperature of the oven(s) will only be recorded at one-hour intervals when the oven burner is not firing.
 5. The actual temperature of the thermal oxidizer at one-minute intervals when the thermal oxidizer is firing.
 6. The job order reference number denoting (as appropriate for burn-off) the oven temperature(s) and the length of time the batch is to remain in the oven.
 7. The oven in which the burning off occurred.
 8. The name of the supervisor or data entry technician who, through the use of the centralized computer, entered the set point temperature for the burn-off oven and the length of time that parts are in the burn-off oven.
 9. The customer name.

The permittee shall keep these records on file for a period of five years and make them available to the Air Quality Division upon request.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1901)

See Appendix 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 any performance test to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. (R 336.1213(3)(c), R 336.2001(5))

See Appendix 8

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. EU-OVEN16-LBayco	16 ²	34-1.5 ²	R 336.1225 R 336.1901 40 CFR 52.21 (c) and (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).

**FG-GENERALPERMIT
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Coating lines installed at the Facility under a General Permit emitting up to 10 tons per year of VOC. A coating line is an operation, which is a single series in a coating process, and is comprised of one or more coating applicators and any associated flash-off areas, drying areas, and ovens wherein one or more surface coatings are applied and subsequently dried or cured. Surface coating may include any paint, lacquer, varnish, adhesive, or other coating material applied on a surface. Surfaces include any substrate except cans, coils, large appliances, metal furniture, magnet wire, fabrics, paper, vinyl, flat wood paneling, or graphic arts lines.

Emission Units: EU-SB7-Green, EU-SB8-Blue, EU-SB9-Yellow, EU-SB10-North

POLLUTION CONTROL EQUIPMENT

The North Line is controlled by a Regenerative Thermal Oxidizer except during exceptional operation which is identified in this permit as by-pass mode.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	2000 lb/month ²	Calendar Month	Each coating line plus all associated purge and clean-up operations.	SC VI.3	R 336.1125 R 336.1702(d)
2. VOC	10 tpy ²	12-month rolling time period as determined at the end of each calendar month	Each coating line plus all associated purge and clean-up operations.	SC VI.3	R 336.1225 R 336.1702(d)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all purge/clean-up solvents and waste coatings from all coating applicators used in FG-GENERALPERMIT. The permittee shall store these materials in closed containers and shall dispose of them in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1702(d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain FG-GENERALPERMIT with high volume-low pressure (HVLP) spray applicators or comparable technology with equivalent transfer efficiency (e.g., electrostatic spray, dip, flowcoat, roller, dip-spin). For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702(d))**
2. The permittee shall not operate any spray application unless particulate control (dry filters or a water curtain) is installed, maintained, and operated in a satisfactory manner.² **(R 336.1331)**

3. A thermal oxidizer or catalytic oxidizer may be installed, maintained, and operated in a satisfactory manner to meet the requirements of this general permit. If a thermal oxidizer or catalytic oxidizer is used for FG-GENERALPERMIT, satisfactory operation requires an overall minimum of 76 percent reduction of VOC emissions to the atmosphere.² **(R 336.1224, R 336.1702(d))**
 - a. Satisfactory operation of a thermal oxidizer includes maintaining a minimum combustion chamber temperature of 1400°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, an average temperature of 1400°F based upon a three-hour rolling average may be used.
 - b. Satisfactory operation of the catalytic oxidizer includes maintaining a minimum catalyst bed inlet temperature of 600°F. In lieu of a minimum temperature, an average temperature of 600°F based upon a three-hour rolling average may be used.
4. For a coating line using a thermal oxidizer: The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the thermal oxidizer to monitor and record the temperature on a continuous basis, during operation of FG-GENERALPERMIT. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval.² **(R 336.1201a(1))**
5. For a coating line using a catalytic oxidizer: The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a temperature monitoring device to continuously monitor the inlet and outlet temperatures of the catalytic oxidizer catalyst bed during operation of FG-GENERALPERMIT. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval.² **(R 336.1201a(1))**

V. TESTING/SAMPLING

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

1. Within 60 days of notification by the AQD, verification of VOC emissions and VOC content (in pounds per gallon) of any coating, reducer, or purge/clean-up solvent, as applied or as received, using federal Reference Test Method 25A, Method 24 or other EPA approved reference method, may be required for continued operation. Verification of the emission rates includes the submittal of a complete report of the test results to the AQD with 60 days following the last date of the test. Upon prior written approval by the AQD District Supervisor, VOC content may alternatively be determined from manufacturer's formulation data. If the Method 25A or Method 24 should differ from the formulation values, the permittee shall use the Method 25A or Method 24 results to determine compliance.² **(R 336.2001, R 336.2003, R 336.2004, R 336.1702(d))**

VI. MONITORING/RECORDKEEPING

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

1. For a coating line using a thermal oxidizer: The permittee shall monitor the temperature in the combustion chamber of the thermal oxidizer and record the temperature on a continuous basis, during operation of FG-GENERALPERMIT. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval.² **(R 336.1201a(1))**
2. For a coating line using a catalytic oxidizer: The permittee shall continuously monitor the inlet and outlet temperatures of the catalytic oxidizer catalyst bed during operation of FG-GENERALPERMIT. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval.² **(R 336.1201a(1))**
3. The permittee shall keep the following information on a monthly basis for FG-GENERALPERMIT:
 - a. Purchase orders and invoices for all coatings, reducers, and purge/clean-up solvents.
 - b. VOC content, in pounds per gallon, of each coating, reducer and purge/clean-up solvent used.
 - c. Gallons of each coating, reducer and purge/clean-up solvent used and reclaimed.
 - d. VOC mass emission calculations determining the monthly emission rate for each coating line, in tons per calendar month, in a format acceptable to the AQD District Supervisor.

- e. VOC mass emission calculations determining the annual emission rate for each coating line, in tons per 12-month rolling time period as determined at the end of each calendar month, the permittee shall keep all records in a format acceptable to the AQD District Supervisor.

The permit shall keep all records in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.² **(R 336.1201a(1), R 336.1225, R 336.1702(d))**

4. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, 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 and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702(d))**
5. For a coating line using a thermal or catalytic oxidizer: The permittee shall keep records of the date, duration, and description of any malfunction of the control equipment, any maintenance performed, any replacement of catalyst and any testing results.² **(R 336.1201a(1))**
6. For a coating line using a thermal oxidizer: The permittee shall keep, in a satisfactory manner, operating temperature records for the thermal oxidizer as required by SC VI.1. If the measured operating temperature of the thermal oxidizer falls below 1400°F during operation of FG-GENERALPERMIT, the permittee may demonstrate compliance based upon a three-hour average temperature, by calculating the average operating temperature for each three-hour period which includes one or more temperature readings below 1400°F. The permittee shall keep all records and make them available to the Department upon request.² **(R 336.1201a(1))**
7. For a coating line using a catalytic oxidizer: The permittee shall keep, in a satisfactory manner, operating temperature records for the catalytic oxidizer as required by SC VI.2. If the measured operating temperature of the catalytic oxidizer falls below 600°F during operation of FG-GENERALPERMIT, the permittee may demonstrate compliance based upon a three-hour average temperature, by calculating the average operating temperature for each three-hour period which includes one or more temperature readings below 600°F. The permittee shall keep all records and make them available to the Department upon request.² **(R 336.1201a(1))**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

1. The exhaust gases from FG-GENERALPERMIT shall be discharged unobstructed vertically upwards to the ambient air at exit points not less than one-and-one-half times the building height (from ground level to point of discharge).¹ **(R 336.1225)**

IX. OTHER REQUIREMENT(S)

1. The permittee shall not replace or modify any portion of FG-GENERALPERMIT, including control equipment or coatings, nor install additional coating lines (or any portion of, including control equipment or coatings) unless all of the following conditions are met:² **(R 336.1201)**
 - a. The permittee shall update the general permit by submitting a new Process Information form (EQP5759) to the Permit Section and District Supervisor, identifying the existing and new equipment a minimum of 10 days before the replacement, modification, or installation of new equipment.
 - b. The permittee shall continue to meet all general permit to install applicability criteria after the replacement, modification or installation of new equipment is complete.
 - c. The permittee shall keep records of the date and description of the replacement or modification, installation of new equipment, or any coating change. All records shall be kept on file for a period of at least five years and made available to the Department upon request.

2. 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 M for Surface Coating of Miscellaneous Metal Parts and Products by the initial compliance date.² **(40 CFR Part 63, Subparts A and M)**

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-RULE287(2)(c)
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.

Emission Units installed on or after December 20, 2016: NA

Emission Units installed prior to December 20, 2016: EU-ORINGCOAT1, EU-ORINGCOAT2, EU-ORINGCOAT3, EU-ORINGCOAT4, EU-QUADCTR, EU-SB1, EU-SB2, EU-SB3, EU-SB4, EU-SB5, EU-SB6, EU-SB15, EU-SB16, EU-SB17, EU-SB18

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Underlying Applicable Requirement
1. Coatings	200 Gallons/month (minus water as applied)	Calendar month	Each emission unit	R 336.1287(2)(c)(i)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

- Any exhaust system installed on or after December 20, 2016, that serves only coating spray equipment shall be equipped with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer’s specifications, or the permittee develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions. All emission units installed before December 20, 2016, with an exhaust system that serves only coating spray equipment must have a properly installed and operated particulate control system. **(R 336.1213(2), R 336.1287(2)(c)(ii), R 336.1910)**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 287(2)(c), Permit to Install Exemption Record form (EQP 3562) or in a format acceptable to the AQD District Supervisor. **(R 336.1213(3))**
 - a. Volume of coating used, as applied, minus water, in gallons. **(R 336.1287(2)(c)(iii))**
 - b. Documentation of any filter replacements or maintenance of water wash control for exhaust systems serving coating spray equipment or other documentation included in a plan developed by the owner or operator of the equipment. **(R 336.1213(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))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

**FG-MACT MMMM
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Each existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR Part 63, Subpart MMMM, 40 CFR 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating. 40 CFR Part 63, Subpart MMMM does not apply to surface coating or a coating operation that meets any of the criteria of 40 CFR 63.3881(c)(1) through (17).

Emission Units: EU-SB1, EU-SB2, EU-SB3, EU-SB4, EU-SB5, EU-SB6, EU-SB7-Green, EU-SB8-Blue, EU-SB9- Yellow, EU-SB10-North, EU-SB15, EU-SB16, EU-SB17, EU-SB18, EU-ORINGCOAT1, EU-ORINGCOAT2, EU-ORINGCOAT3, EUORINGCOAT4, EU-QUADCTR, EU-METALCOAT

POLLUTION CONTROL EQUIPMENT

A Regenerative Thermal Oxidizer controls the emissions on the Superline and the North Line except during exceptional operation which is identified in this permit as by-pass mode.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	2.6 lbs per gal of coating solids ²	12-month rolling time period as determined at the end of each calendar month	Existing – General Use Coating	SC V.1, V.2, VI.1 through VI.9	40 CFR 63.3890(b)(1)
2. Organic HAP	27.5 lbs per gal of coating solids ²	12-month rolling time period as determined at the end of each calendar month	Existing – High Performance Coating	SC V.1, V.2, VI.1 through VI.9	40 CFR 63.3890(b)(2)
3. Organic HAP	12.4 lbs per gal of coating solids ²	12-month rolling time period as determined at the end of each calendar month	Existing – Extreme Performance Fluoropolymer Coating	SC V.1, V.2, VI.1 through VI.9	40 CFR 63.3890(b)(5)

4. The permittee shall determine whether the organic HAP emission rate is equal to or less than the applicable emission limits in 40 CFR 63.3890 using at least one of the following three options, which are listed in 40 CFR 63.3891(a) through (c):
- a. Compliant material option,
 - b. Emission rate without add-on controls option, or
 - c. Emission rate with add-on controls option.

The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials used when determining the emission rate.² **(40 CFR 63.3891)**

5. Any coating operation(s) using the compliant material option or the emission rate without add-on controls option, shall be in compliance with the applicable emission limits in 40 CFR 63.3890 at all times. **(40 CFR 63.3900(a)(1))**
6. If the surface coating operation(s) meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.3890(a) or (b), the permittee may comply separately with each subcategory emission limit or comply using one of the alternatives in 40 CFR 63.3890(c)(1) or (2).² **(40 CFR 63.3890(c))**
7. The permittee may comply with a facility-specific emission limit calculated from the relative amount of coating activity that is subject to each emission limit. If the permittee elects to comply using the facility-specific emission limit alternative, then compliance with the facility-specific emission limit and the emission limitations in this subpart for all surface coating operations constitutes compliance with this and other applicable surface coating NESHAP. The procedures for calculating the facility-specific emission limit are specified in 40 CFR 63.3890. In calculating a facility-specific emission limit, include coating activities that meet the applicability criteria of other surface coating NESHAP and constitute more than 1 percent of total coating activities at the facility. **(40 CFR 63.3881(e)(3))**

II. MATERIAL LIMIT(S)

For the compliant materials option, the permittee shall meet the material limits specified in the following table.

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each Thinner and/or Additive	No Organic HAP* ²	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, VI.2, VI.3 & VI.5	40 CFR 63.3891(a)
2. Each Cleaning Material	No Organic HAP* ²	Continuous	Each Coating Operation using Compliant Material Option	SC VI.1, VI.2, VI.3 & VI.5	40 CFR 63.3891(a)

*Determined according to 40 CFR 63.3941(a).

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **(40 CFR 63.3893)**
2. For any coating operation(s) using the emission rate with add-on controls option, the permittee must develop and implement a work practice plan, to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s). The work practice plan must specify practices and procedures to ensure, at a minimum, the following elements are implemented:
 - a. All organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.² **(40 CFR 63.3893(b)(1))**
 - b. Spills of organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.² **(40 CFR 63.3893(b)(2))**
 - c. Organic HAP containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.² **(40 CFR 63.3893(b)(3))**
 - d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.² **(40 CFR 63.3893(b)(4))**
 - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.² **(40 CFR 63.3893(b)(5))**

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 63.3893(c))**

3. If the affected source uses an emission capture system and add-on control device, the permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3). This SSMP must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. 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 63.3900(c))**
4. The coating operation(s) must be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3892 at all times, except for solvent recovery systems which conduct liquid-liquid material balances according to 40 CFR 63.3961(j). **(40 CFR 63.3900(a)(2)(ii))**
5. Any coating operation(s) using the emission rate with add-on controls option must be in compliance with the work practice standards in 40 CFR 63.3893 at all times.² **(40 CFR 63.3900(a)(2)(iii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall not operate FG-MACT MMMM unless the associated control device is installed, maintained, and operated in a satisfactory manner.² **(40 CFR 63.3892(b))**
2. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall meet the operating limits specified in Table 1 of 40 CFR Part 63, Subpart MMMM as identified below. The permittee must establish the operating limits during the performance test according to the requirements in 40 CFR 63.3967. The permittee must meet the operating limits at all times after established.² **(40 CFR 63.3892(b), 40 CFR Part 63, Subpart MMMM, Table 1)**

Add-on Control Device	Operating Limit
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).
Emission capture system that is <u>not</u> a PTE according to 40 CFR 63.3965(a).	a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).

V. TESTING/SAMPLING

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

1. The permittee shall determine the mass fraction of organic HAP for each material used, the mass fraction of coating solids for each coating, and the density of each material used in accordance with 40 CFR 63.3941, 40 CFR 63.3951, and/or 40 CFR 63.3961. **(40 CFR 63.3941, 40 CFR 63.3951, 40 CFR 63.3961)**
2. For any coating operation(s) using the emission rate with add-on controls option, the permittee must conduct each performance test required by 40 CFR 63.3960 according to the requirements in 40 CFR 63.3964(a)(1) and (2). The permittee must conduct each performance test of an emission capture system according to the requirements in 40 CFR 63.3965. The permittee must conduct each performance test of an add-on control device according to the requirements in 40 CFR 63.3966. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.1213(3), R 336.2001, R 336.2002, R 336.2003, 40 CFR 63.3964(a) and (b))**

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 conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months.² **(40 CFR 63.3940, 40 CFR 63.3950, 40 CFR 63.3960)**
2. The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931.² **(40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j))**
3. The permittee shall maintain, at a minimum, the following records for each compliance period:
 - a. A copy of each notification and report that is submitted to comply with Subpart Mmmm, and the documentation supporting each notification and report.² **(40 CFR 63.3930(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 and density of each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating.² **(40 CFR 63.3930(b))**
 - c. A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used.² **(40 CFR 63.3930(c)(1))**
 - d. For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941.² **(40 CFR 63.3930(c)(2))**
 - e. For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951.² **(40 CFR 63.3930(c)(3))**
 - f. For the emission rate with add-on controls option, the calculations specified in 40 CFR 63.3930(c)(4)(i) through (v).² **(40 CFR 63.3930(c)(4))**
 - g. The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected source, the permittee may maintain purchase records for each material used rather than a record of the volume used.² **(40 CFR 63.3930(d))**
 - h. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight.² **(40 CFR 63.3930(e))**
 - i. The volume fraction of coating solids for each coating used during each compliance period.² **(40 CFR 63.3930(f))**
 - j. For either the emission rate without add-on controls or with add-on controls option, the density of for each coating, thinner and/or other additive, and cleaning material used during each compliance period.² **(40 CFR 63.3930(g))**
 - k. The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4).² **(40 CFR 63.3930(h))**
 - l. The date, time, and duration of each deviation.² **(40 CFR 63.3930(j))**
 - m. For the emission rate with add-on controls option, records specified in 40 CFR 63.3930(k)(1) through 40 CFR 63.3930(k)(8).² **(40 CFR 63.3930(k))**

4. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the operating limits specified in Table 1 of 40 CFR Part 63, Subpart Mmmm using the applicable method(s) described below:² **(40 CFR 63.3963(c))**

Add-on Control Device	Operating Limit	Continuous Compliance Demonstration Method
Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3967(a).	i. Collect the combustion temperature data according to 40 CFR 63.3968(c) ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average combustion temperature at or above the temperature limit.
Emission capture system that is <u>not</u> a PTE according to 40 CFR 63.3965(a).	a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to 40 CFR 63.3967(f).	i. Collect the gas volumetric flow rate or duct static pressure for each capture device according to 40 CFR 63.3968(g) ii. Reduce the data to 3-hour block averages; and iii. Maintain the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limit.

5. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.3890, for each compliance period, using Equation 2 of 40 CFR 63.3941. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.3941(a).² **(40 CFR 63.3942)**
6. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to 40 CFR 63.3951(a) through (g).² **(40 CFR 63.3952)**
7. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to the procedures in 40 CFR 63.3961.² **(40 CFR 63.3963)**
8. During the performance test required by 40 CFR 63.3960, the permittee shall perform the applicable monitoring and recordkeeping in accordance with 40 CFR 63.3967 to establish the emission capture system and add-on control device operating limits required by 40 CFR 63.3892.² **(40 CFR 63.3967)**
9. For any coating operation(s) using the emission rate with add-on controls option, the permittee shall install, operate, and maintain each Continuous Parameter Monitoring System (CPMS) according to the requirements of 40 CFR 63.3968(a). If the capture system contains a bypass line, the permittee shall comply with the requirements of 40 CFR 63.3968(b).² **(40 CFR 63.3968)**
10. The permittee must apply to the USEPA for approval of alternative monitoring under 40 CFR 63.8(f), if using an add-on control device other than those listed in Table 1 of 40 CFR Part 63, Subpart Mmmm, or to monitor an alternative parameter and comply with a different operating limit.² **(40 CFR 63.3892(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))**
4. For the compliant material option, the permittee shall report a deviation, as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(5), if any coating used for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890; or any thinner or cleaning material used contains any organic HAP.² **(40 CFR 63.3942(b))**
5. For the emission rate without add-on controls, the permittee shall report a deviation, as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(6), if the organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890.² **(40 CFR 63.3952(b))**
6. For the emission rate with add-on controls option, the permittee shall report the following as deviations as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(7):
 - a. The organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890;² **(40 CFR 63.3963(b))**
 - b. An operating parameter is out of the allowed range;² **(40 CFR 63.3963(c)(1))**
 - c. Any control system by-pass line, for which liquid-liquid material balances are not carried out, is opened;² **(40 CFR 63.3963(d))**
 - d. Deviations from work practice standards occur.² **(40 CFR 63.3963(e))**
7. The permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 40 CFR 63.8(f)(4), 40 CFR 63.9(b) through (e) and (h), and an initial notification and a notification of compliance status as specified in 40 CFR 63.3910.² **(40 CFR 63.3910)**
8. The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.3890, include a statement that the coating operations were in compliance.² **(40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), 40 CFR 63.3963(f))**
9. The permittee must submit the following:
 - a. Within 60 days after the date of completing each performance test for emission capture systems and add-on control devices, the results of the performance tests required by 40 CFR Part 63, Subpart M to the USEPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). Performance test data must be submitted in the file format generated through use of the USEPA's Electronic Reporting Tool (ERT) (see <https://www.epa.gov/technical-air-pollution-resources>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website. For data collected using test methods not listed on the ERT Website, the permittee must submit the results of the performance test to the Administrator at the appropriate address listed in 40 CFR 63.13. **(40 CFR 63.3920(b) and (d))**

- b. Initial notifications required in 40 CFR 63.9(b) and the notification of compliance status required in 40 CFR 63.9(h) and 40 CFR 63.3910(c) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must upload to CEDRI an electronic copy of each applicable notification in portable document format (PDF). The applicable notification must be submitted by the deadline specified in this subpart, regardless of the method in which the reports are submitted. **(40 CFR 63.3920(e))**
 - c. On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for 1-year, whichever date is later, the semiannual compliance report required in 40 CFR 63.3920(a) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov/>). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (<https://www.epa.gov/electronic-reporting-air-emissions/cedri>). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate addresses listed in 40 CFR 63.13. Once the form has been available in CEDRI for 1 year begin submitting all subsequent reports via CEDRI. **(40 CFR 63.3920(f))**
10. If the permittee switches between compliance options which are listed in 40 CFR 63.3891(a) through (c), for any coating operation or group of coating operations, the permittee shall report the switch in the next semiannual compliance report required under 40 CFR 63.3920.² **(40 CFR 63.3891)**
 11. The permittee must report the results of performance tests for emission capture systems and add-on control devices within 60 days after the completion of the performance tests. The permittee shall submit any performance test reports to the AQD Technical Programs Unit and District Office in a format approved by the AQD. **(R 336.2001(5), 40 CFR 63.3920(b))**

See Appendix 8

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 for Surface Coating of Miscellaneous Metal Parts and Products. **(40 CFR Part 63, Subparts A and MMMM)**

Footnotes:

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

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

FG-COLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: EU-COLDCLEANER, EU-SPRAYCLEANER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. **(R 336.1281(2)(h))**
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(2)(r)(iv))**
2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**

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

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

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

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1. Acronyms and Abbreviations

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

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

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 monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in FG-CUREOVENS and FG-BURNOFFOVENS:

1. Any visible emissions observed shall be immediately reported to the Shift Supervisor. All employees shall be trained to contact the Shift Supervisor immediately when visible emissions are observed.
2. The Shift Supervisor, or a qualified employee assigned by him, shall immediately determine which stack is emitting visible emissions and whether the emissions are normal. A record of the event shall be made whether the emissions are normal or abnormal.
3. If the emissions are abnormal, the Shift Supervisor shall take immediate action to mitigate the emissions, including shutting down the oven, if necessary.
4. For all abnormal emissions, a report shall be prepared. The report shall include the date, time, and duration of the event; the oven involved, material being cured or burned off, operator's name, and procedure being used for curing or burn-off. The report shall also define the cause of the emissions, if known. The report shall recommend follow-up actions, as appropriate, such as: further investigation of the cause, repair of faulty equipment, modification of procedures, or retraining of personnel. A record of completion of the follow-up action shall be appended to the report. Reports shall be submitted to the Air Quality Division within 10 business days from the occurrence and shall be retained on-site for five years.

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N2610-2017. 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-N2610-2017 is being reissued as Source-Wide PTI No. MI-PTI-N2610-2023

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

There are no specific emission calculations to be used for this ROP. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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.

Appendix 9. Design/Equipment

The following Design/Equipment parameters are the details to the Design/Equipment requirements identified and referenced in FG-CUREOVENS and/or FG-BURNOFFOVENS:

Computerized Temperature Control System Requirements

1. The temperatures of the curing ovens and the length of time that parts are in the curing ovens for curing, shall be in accordance with the specifications of the coating manufacturer for the curing of each coating applied.
2. Curing ovens shall not be used to burn-off coatings.
3. The temperatures of the curing and burn-off ovens and the length of time that parts are in the ovens for curing or burn-off shall be set through the use of a centralized computer.
4. The only individuals who shall set the temperatures through the use of a centralized computer for the curing and burn-off ovens are supervisors or system data technicians who are trained to operate the System.

5. The only individuals who shall set the length of time that parts are in the curing and burn-off ovens through the use of a centralized computer are supervisors or system data technicians who are trained to operate the System.

The following Design/Equipment parameters are the details to the Design/Equipment requirements identified and referenced in FG-CUREOVENS:

Maintenance Plan for Stack Monitoring System

1. SEMI-ANNUAL FUNCTIONAL CHECK

A functional check of the Triboguard III System will be conducted on a semi-annual basis. The functional check will consist of the injection of particulate into the emission stream in order to test the sensitivity and response time of the Triboguard III System. The signal response during the particulate injection check will be recorded and compared to previous checks. If signal levels differ significantly, action will be taken to investigate and correct the cause of the discrepancy.

2. MANUAL ZERO PROCEDURE

A manual zero procedure will be conducted on an annual basis to check the range operation of the Triboguard III auto-zeroing function. The procedure will be conducted as follows:

1. Enter the RANGE menu. Note and record the current setting and then set the Range to 1.
2. Exit menus. (Note: if the Range was > 1000, an Auto Zero will occur when exiting menus).
3. Open the enclosure to gain access to the ZERO control and RUN/ZERO jumper on the right side of the PC board.
4. Move the RUN/ZERO jumper (J4) to the ZERO position. Connect a DVM (set to measure in millivolts) between test points. AGND (TP4), and ZER (TPI).
5. Adjust the ZERO control (R21) to achieve 0 +/- 10 mV on the DVM.
6. Disconnect the DVM and return the RUN/ZERO jumper (J4) to the RUN position.
7. Return the RANGE setting to the value recorded in Step 1.
8. The Triboguard III is designed to perform an Automatic Zero to compensate for any manual zero adjustments within one hour. However, if a moderate zero adjustment was required, an immediate auto-zero shall be initiated by removing and reinstalling the fuse to momentarily interrupt power to the Triboguard III.

Appendix 10. Process/Operational Restrictions(s)

The following Process/Operational parameters are the details to the Process/Operational requirements identified and referenced in FG-CUREOVENS:

TOEFCO ENGINEERED COATING SYSTEMS WORK PRACTICE STANDARDS – CURE OVENS

This oven is not to be used to burn-off “Coated Parts.” Coated Parts means parts coated with obvious visual substances such as, but not limited to, Teflon, paints, oils, grease, and rust inhibitors. When the parts are ready for processing in the oven, the oven operator will communicate the Job Order to a supervisor or a trained data technician who will enter the data into a central computer. Oven operating temperature and length of curing time will be controlled by the central computer. If you are in doubt as to whether or not a part is a Coated Part, contact a supervisor. Violation of these procedures could lead to your unpaid suspension or possible termination of your employment.