

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

EFFECTIVE DATE: August 5, 2021
REVISION DATE: September 21, 2023

ISSUED TO

Belding Tank Technologies, Inc.

State Registration Number (SRN): N3748

LOCATED AT

200 North Gooding Street, Belding, Ionia County, Michigan 48809-0160

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N3748-2021a

Expiration Date: August 5, 2026

Administratively Complete ROP Renewal Application Due Between
February 5, 2025 and February 5, 2026

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-N3748-2021a

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

Heidi Hollenbach, Grand Rapids District Supervisor

TABLE OF CONTENTS

AUTHORITY AND ENFORCEABILITY	4
A. GENERAL CONDITIONS.....	5
Permit Enforceability	5
General Provisions.....	5
Equipment & Design	6
Emission Limits.....	6
Testing/Sampling	6
Monitoring/Recordkeeping	7
Certification & Reporting	7
Permit Shield	8
Revisions	9
Reopenings.....	9
Renewals.....	10
Stratospheric Ozone Protection	10
Risk Management Plan.....	10
Emission Trading	10
Permit to Install (PTI)	11
B. SOURCE-WIDE CONDITIONS	12
C. EMISSION UNIT SPECIAL CONDITIONS	16
EMISSION UNIT SUMMARY TABLE.....	16
EUMOLDROOM1	17
EUMOLDROOM2	19
EUMR3&4NORTHMOLD	21
EUMR3&4MIDMOLD	23
EUMR3&4SOUTHMOLD	25
EUMOLDROOM5	27
EUMOLDROOM6	29
EUTANKASSEMBLY	31
EUTANKASSEMBLY2	33
EUTANKASSEMBLY3	35
EUCLEANUP	37
D. FLEXIBLE GROUP SPECIAL CONDITIONS.....	39
FLEXIBLE GROUP SUMMARY TABLE.....	39
FGCOMPOSITESMACT	40
FGMR3&4.....	43
FGRULE290	45
E. NON-APPLICABLE REQUIREMENTS	48
APPENDICES	49
Appendix 1. Acronyms and Abbreviations.....	49
Appendix 2. Schedule of Compliance.....	50
Appendix 3. Monitoring Requirements	50
Appendix 4. Recordkeeping	50
Appendix 5. Testing Procedures	57

Appendix 6. Permits to Install..... 57
Appendix 7. Emission Calculations 60
Appendix 8. Reporting 60

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 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. VOCs	89.9 tons per year ²	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SC VI.2	R 336.1205(3)
2. Styrene	57.6 pounds per hour ²	Calendar day average as determined daily by facility-wide emissions and calendar day hours of operation	SOURCE-WIDE	SC VI.2	R 336.1225 R 336.1901
3. Styrene	76.0 tons per year ²	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SC VI.2	R 336.1225

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Styrene	50% by weight for resins applied using the chop/hoop winding technique ²	Instantaneous	SOURCE-WIDE	SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
2. Styrene	35% by weight for vinyl ester lamination resins that do not contain vapor suppressants ²	Instantaneous	SOURCE-WIDE	SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
3. Styrene	45% by weight For vinyl ester lamination resins that contain vapor suppressants ²	Instantaneous	SOURCE-WIDE	SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
4. Styrene	50% by weight for resins applied using wet filament winding technique ²	Instantaneous	SOURCE-WIDE	SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
5. Styrene	50% by weight for isophthalic lamination resins	Instantaneous	SOURCE-WIDE	SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
6. Styrene	37% by weight of all gelcoats ²	Instantaneous	SOURCE-WIDE	SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
7. Styrene	42% by weight of tooling gelcoats ²	Instantaneous	SOURCE-WIDE	SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. 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)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall only spray apply resins by means of non-atomizing mechanical applicator guns or technology that produces equivalent or lower styrene emission rates.² (R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)
2. Filament chop/hoop winding shall be carried out by use of dry winding of fiberglass together with application of chopped fiberglass and resin by use of non-atomizing mechanical applicator guns or other technology that produces equivalent or lower styrene emission rates.² (R 336.1205, R 336.1225, R 336.1702(a))
3. The permittee shall not operate any mold room unless its respective exhaust filters are installed, maintained, and operated in a satisfactory manner.² (R 336.1224, R 336.1301, R 336.1331, 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 complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205, R 336.1225, R 336.1702)
2. The permittee shall keep the following information Source-Wide:
 - a. A current listing from the manufacturer of the chemical composition of each resin, gelcoat and catalyst including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both.
 - b. The as-supplied and as-applied styrene and methyl methacrylate content of each lamination resin, gelcoat, tooling gelcoat used and the methyl ethyl ketone content of each catalyst used.
 - c. Styrene mass emission calculations determining the overall average hourly emission rate facility-wide in pounds per hour of operation for each calendar day. The overall average hourly styrene emission rate shall be determined based on the arithmetic sum of the individual emission unit hourly emission rates for each calendar day.

- d. Styrene mass emission calculations determining the annual emissions in tons per 12-month rolling time period as determined at the end of each calendar month.
- e. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
- f. 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 records shall be kept in the formats specified in Attachments A, B, C, D & E of Appendix 4, or an alternate format that has been approved by the AQD District Supervisor.² **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**

3. The permittee shall maintain a current listing from the manufacturer of the vapor suppressant effectiveness factor, as determined per the test method in 40 CFR Part 63, Subpart WWWW, Appendix A, for resins containing vapor suppressants. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702(a), 40 CFR Part 63, Subpart WWWW)**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. All waste resins, gelcoats, catalysts and acetone shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1205, R 336.1225, R 336.1702(a))**
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 WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

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).

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
EUMOLDROOM1	One tank mold located in Mold Room 1 with one exhaust stack (SVNWSTACK-0001)	08-30-1993/ 10-31-2001/ 08-21-2006 09-01-2018	FGCOMPOSITESMACT
EUMOLDROOM2	Two tank molds located in Mold Room 2 with one exhaust stack (SVNESTACK-002)	08-30-1993/ 10-31-2001 09-01-2018	FGCOMPOSITESMACT
EUMR3&4NORTHMOLD	One tank mold located at the north end of Mold Room 3&4. Exhausted by one stack (SVESTACK-005)	03-10-1997/ 10-31-2001 09-01-2018	FGCOMPOSITESMACT FGMR3&4
EUMR3&4MIDMOLD	One tank mold located in the middle of Mold Room 3&4. Exhausted by two stacks (SVESESTACK-004, SVESTACK-005)	03-10-1997/ 10-31-2001 09-01-2018	FGCOMPOSITESMACT FGMR3&4
EUMR3&4SOUTHMOLD	One tank mold located at the south end of Mold Room 3&4. Exhausted by one stack (SVESESTACK-004)	03-10-1997/ 10-31-2001 09-01-2018	FGCOMPOSITESMACT FGMR3&4
EUMOLDROOM5	Two tank molds located in Mold Room 5 with one exhaust stack (SVNESTACK-006).	04-30-2007/ 10-18-2016 09-01-2018 06-30-2023	FGCOMPOSITESMACT
EUMOLDROOM6	Two tank molds located in Mold Room 6 with one exhaust stack.	06-30-2023	FGCOMPOSITESMACT
EUTANKASSEMBLY	Assembly of tank components in the Assembly Building.	08-30-1993/ 10-31-2001 09-01-2018	FGCOMPOSITESMACT
EUTANKASSEMBLY2	Assembly of tank components in the Assembly Building.	04-29-2008 09-01-2018	FGCOMPOSITESMACT
EUTANKASSEMBLY3	Assembly of tank components in this Assembly Building.	06-30-2023	FGCOMPOSITESMACT
EUCLEANUP	Usage of cleanup and purge solvent at various locations in the facility.	08-30-1993/ 10-31-2001/ 04-19-2005/ 06-27-2005	FGCOMPOSITESMACT
EUSPRAYFOAM	Two part spray foam	1992	FGRULE290

**EUMOLDROOM1
 EMISSION UNIT CONDITIONS**

DESCRIPTION

One (1) Tank mold located in Mold Room 1 with one exhaust stack.

Flexible Group ID: FGCOMPOSITESMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	438 pounds per calendar day ²	Calendar day	EUMOLDROOM1	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
2. VOCs	15.3 tons per year ²	Based on a 12-month rolling time period as determined at the end of each month	EUMOLDROOM1	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
3. Styrene	17.8 pounds per hour ²	Based on a calendar day average, determined by calendar day usage and hours of operation	EUMOLDROOM1	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
4. Styrene	15.1 tons per year ²	Based on a 12-month rolling time period as determined at the end of each month	EUMOLDROOM1	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205, R 336.1225, R 336.1702)
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² (R 336.1205, R 336.1225, R 336.1702)

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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. SVNWSTACK-0001	30 ¹	60 ¹	R 336.1225 R 336.1901

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 WWWW for Reinforced Plastic Composites Production. (40 CFR Part 63, Subparts A and WWWW)

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).

**EUMOLDROOM2
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Two (2) Tank molds located in Mold Room 2 with one exhaust stack.

Flexible Group ID: FGCOMPOSITESMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	937 pounds per calendar day ²	Calendar day	EUMOLDROOM2	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
2. VOCs	29.7 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUMOLDROOM2	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
3. Styrene	38.0 pounds per hour ²	Based on a calendar day average, determined by calendar day material usage and hours of operation	EUMOLDROOM2	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
4. Styrene	29.2 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUMOLDROOM2	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)

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))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205, R 336.1225, R 336.1702)
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² (R 336.1205, R 336.1225, R 336.1702)

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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. SVNESTACK-0002	36 ¹	60 ¹	R 336.1225 R 336.1901

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 WWWW for Reinforced Plastic Composites Production. (40 CFR Part 63, Subparts A and WWWW)

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).

**EUMR3&4NORTHMOLD
 EMISSION UNIT CONDITIONS**

DESCRIPTION

One (1) Tank mold located at the north end of Mold Room 3&4. Exhausted by one stack.

Flexible Group ID: FGCOMPOSITESMACT, FGMR3&4

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	391 pounds per calendar day ²	Calendar day	EUMR3&4NORTH MOLD	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
2. VOCs	6.6 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUMR3&4NORTH MOLD	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
3. Styrene	15.8 pounds per hour ²	Based on a calendar day average, determined by calendar day material usage and hours of operation	EUMR3&4NORTH MOLD	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
4. Styrene	6.5 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUMR3&4NORTH MOLD	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)

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))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² **(R 336.1205, R 336.1225, R 336.1702)**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

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).

**EUMR3&4MIDMOLD
 EMISSION UNIT CONDITIONS**

DESCRIPTION

One (1) Tank mold located in the middle of Mold Room 3&4. Exhausted by two stacks.

Flexible Group ID: FGCOMPOSITESMACT, FGMR3&4

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	391 pounds per calendar day ²	Calendar day	EUMR3&4MIDMOLD	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
2. VOCs	8.9 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUMR3&4MIDMOLD	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
3. Styrene	15.8 pounds per hour ²	Based on a calendar day average, determined by calendar day material usage and hours of operation	EUMR3&4MIDMOLD	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
4. Styrene	8.8 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUMR3&4MIDMOLD	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)

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))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² **(R 336.1205, R 336.1225, R 336.1702)**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

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).

**EUMR3&4SOUTH MOLD
 EMISSION UNIT CONDITIONS**

DESCRIPTION

One (1) Tank mold located at the south end of Mold Room 3&4. Exhausted by one stack.

Flexible Group ID: FGCOMPOSITESMACT, FGMR3&4

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	391 pounds per calendar day ²	Calendar day	EUMR3&4SOUTH MOLD	SC VI.1, SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
2. VOCs	14.0 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUMR3&4SOUTH MOLD	SC VI.1, SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
3. Styrene	15.8 pounds per hour ²	Based on a calendar day average, determined by calendar day material usage and hours of operation	EUMR3&4SOUTH MOLD	SC VI.1, SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
4. Styrene	13.8 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUMR3&4SOUTH MOLD	SC VI.1, SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)

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))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² **(R 336.1205, R 336.1225, R 336.1702)**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

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).

**EUMOLDROOM5
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Two (2) tank molds located in Mold Room 5 with one exhaust stack.

Flexible Group ID: FGCOMPOSITESMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	391 pounds per day ²	Calendar day	EUMOLDROOM5	SC VI.1 SC VI.2	R 366.1205 R 336.1225 R 336.1702(a)
2. VOCs	24.8 tons per year ²	Based on a 12-month rolling time period as determined at the end of each calendar month	EUMOLDROOM5	SC VI.1 SC VI.2	R 366.1205 R 336.1225 R 336.1702(a)
3. Styrene	15.8 pounds per hour ²	Based on a calendar day average as determined by material usage and hours of operation for the day	EUMOLDROOM5	SC VI.1 SC VI.2	R 366.1205 R 336.1225 R 336.1702(a)
4. Styrene	23.6 tons per year ²	Based on a 12-month rolling time period as determined at the end of each calendar month	EUMOLDROOM5	SC VI.1 SC VI.2	R 366.1205 R 336.1225 R 336.1702(a)

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))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² **(R 336.1205, R 336.1225, R 336.1702)**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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. SVENESTACK-0006	36 ²	60 ²	R 336.1225 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

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).

**EUMOLDROOM6
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Two (2) tank molds located in Mold Room 6 with one exhaust stack.

Flexible Group ID: FGCOMPOSITESMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	391 pounds per Day ²	Calendar day	EUMOLDROOM6	SC VI.1 SC VI.2	R 366.1205 R 336.1225 R 336.1702(a)
2. VOCs	24.8 tons per year ²	Based on a 12-month rolling time period as determined at the end of each calendar month	EUMOLDROOM6	SC VI.1 SC VI.2	R 366.1205 R 336.1225 R 336.1702(a)
3. Styrene	15.8 pounds per hour ²	Based on a calendar day average as determined by material usage and hours of operation for the day	EUMOLDROOM6	SC VI.1 SC VI.2	R 366.1205 R 336.1225 R 336.1702(a)
4. Styrene	23.6 tons per year ²	Based on a 12-month rolling time period as determined at the end of each calendar month	EUMOLDROOM6	SC VI.1 SC VI.2	R 366.1205 R 336.1225 R 336.1702(a)

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))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205, R 336.1225, R 336.1702)
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² (R 336.1205, R 336.1225, R 336.1702)

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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. SVMRSTACK9	60 ²	40 ²	R 336.1225 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production.² (40 CFR Part 63, Subparts A and WWWW)

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).

**EUTANKASSEMBLY
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Assembly of tank components in the Assembly Building.

Flexible Group ID: FGCOMPOSITESMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	62.2 pounds per calendar day ²	Calendar day	EUTANKASSEMBLY	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
2. VOCs	3.6 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUTANKASSEMBLY	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
3. Styrene	2.6 pounds per hour ²	Based on a calendar day average, determined by calendar day material usage and hours of operation	EUTANKASSEMBLY	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
4. Styrene	3.6 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUTANKASSEMBLY	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)

II. MATERIAL LIMIT(S)

1. The styrene content of any resin that does not contain a vapor suppressant used for tank assembly purposes shall not exceed 35% by weight.² **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
2. The styrene content of any resin that contains a vapor suppressant used for tank assembly purposes shall not exceed 45% by weight.² **(R 336.1225, R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Resin used for tank assembly purposes shall be applied by bucket and brush, mechanical non-atomized application techniques, or other technology that produces equivalent or lower styrene emission rates.² **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**

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. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² **(R 336.1205, R 336.1225, R 336.1702)**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

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).

**EUTANKASSEMBLY2
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Assembly of tank components in the Assembly Building.

Flexible Group ID: FGCOMPOSITESMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	62.2 pounds per calendar day ²	Calendar day	EUTANKASSEMBLY2	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
2. VOCs	3.6 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUTANKASSEMBLY2	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
3. Styrene	2.6 pounds per hour ²	Based on a calendar day average, determined by calendar day material usage and hours of operation	EUTANKASSEMBLY2	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
4. Styrene	3.6 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUTANKASSEMBLY2	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)

II. MATERIAL LIMIT(S)

1. The styrene content of any resin that does not contain a vapor suppressant used for tank assembly purposes shall not exceed 35% by weight.² (R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)
2. The styrene content of any resin that contains a vapor suppressant used for tank assembly purposes shall not exceed 45% by weight.² (R 336.1225, R 336.1702(a))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Resin used for tank assembly purposes shall be applied by bucket and brush, mechanical non-atomized application techniques, or other technology that produces equivalent or lower styrene emission rates.² (R 336.1205, R 336.1225, R 336.1702(a))

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. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² **(R 336.1205, R 336.1225, R 336.1702)**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

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).

**EUTANKASSEMBLY3
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Assembly of tank components in this Assembly Building.

Flexible Group ID: FGCOMPOSITESMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	62.2 pounds per calendar day ²	Calendar day	EUTANKASSEMBLY3	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
2. VOCs	3.6 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUTANKASSEMBLY3	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
3. Styrene	2.6 pounds per hour ²	Based on a calendar day average, determined by calendar day material usage and hours of operation	EUTANKASSEMBLY3	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)
4. Styrene	3.6 tons per year ²	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUTANKASSEMBLY3	SC VI.1 SC VI.2	R 336.1205 R 336.1225 R 336.1702(a)

II. MATERIAL LIMIT(S)

1. The styrene content of any resin that does not contain a vapor suppressant used for tank assembly purposes shall not exceed 35% by weight.² **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)**
2. The styrene content of any resin that contains a vapor suppressant used for tank assembly purposes shall not exceed 45% by weight.² **(R 336.1225, R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Resin used for tank assembly purposes shall be applied by bucket and brush, mechanical non-atomized application techniques, or other technology that produces equivalent or lower styrene emission rates.² **(R 336.1205, R 336.1225, R 336.1702(a), R 336.1901)**

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. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205, R 336.1225, R 336.1702)**
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² **(R 336.1205, R 336.1225, R 336.1702)**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production.² **(40 CFR Part 63, Subparts A and WWWW)**

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).

**EUCLEANUP
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Usage of cleanup and purge solvent at various locations in the plant.

Flexible Group ID: FGCOMPOSITESMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Acetone	55.0 tons per year ¹	Based on a 12-month rolling time period, as determined at the end of each calendar month	EUCLEANUP	SC VI.1 SC VI.2	R 336.1224 R 336.1225

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))

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205, R 336.1225, R 336.1702)
2. The permittee shall keep records in the approved formats and procedures in Appendix 4.² (R 336.1205, R 336.1225, R 336.1702)

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart WWWW for Reinforced Plastic Composites Production. **(40 CFR Part 63, Subparts A and WWWW)**

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).

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
FGCOMPOSITESMACT	Requirements of the Reinforced Plastic Composites Production NESHAP – 40 CFR Part 63, Subpart WWWW.	EUMOLDROOM1 EUMOLDROOM2 EUMR3&4NORTHMOLD EUMR3&4MIDMOLD EUMR3&4SOUTHMOLD EUMOLDROOM5 EUMOLDROOM6 EUTANKASSEMBLY EUTANKASSEMBLY2 EUTANKASSEMBLY3 EUCLEANUP
FGMR3&4	Stack dimension requirements for Mold Room 3&4.	EUMR3&4NORTHMOLD EUMR3&4MIDMOLD EUMR3&4SOUTHMOLD
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	EUSPRAYFOAM

FGCOMPOSITESMACT FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Open Molding Operations emitting less than 100 TPY of HAPs and subject to the Reinforced Plastic Composites Production NESHAP – 40 CFR Part 63, Subpart WWWW.

Emission Units: EUMOLDROOM1, EUMOLDROOM2, EUMR3&4NORTHMOLD, EUMR3&4MIDMOLD, EUMR3&4SOUTHMOLD, EUMOLDROOM5, EUMOLDROOM6, EUTANKASSEMBLY, EUTANKASSEMBLY2, EUTANKASSEMBLY3, EUCLEANUP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. The permittee shall not operate FGCOMPOSITESMACT except in compliance with the organic HAP emission limits in 40 CFR Part 63, Subpart WWWW, Table 3. **(40 CFR 63.5805)**
2. The permittee must use one or a combination of the following methods to meet the standards for open molding operations in Table 3 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5810)**
 - a. Demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limits in Table 3 of 40 CFR Part 63, Subpart WWWW. **(40 CFR 63.5810(a))**
 - b. Demonstrate that, on average, the facility meets the individual organic HAP emission limits for each combination of operation type and resin application method or gel coat type. Demonstrate that, on average, the facility meets the individual organic HAP emission limits for each unique combination of operation type and resin application method or gel coat type shown in Table 3 to this subpart that applies to the facility. **(40 CFR 63.5810(b))**
 - c. Demonstrate compliance with a weighted average emission limit. Demonstrate each month that the facility meets each weighted average of the organic HAP emission limits in Table 3 to this subpart that apply the weighted average organic HAP emission limits for all open molding operations. **(40 CFR 63.5810(c))**
 - d. Meet the organic HAP emission limits for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are non-corrosion-resistant, corrosion-resistant and/or high strength, and tooling. **(40 CFR 63.5810(d))**
3. The permittee may switch between the compliance options in 2(a) through 2(d). When changing to an option based on a 12-month rolling average, the facility must base the average on the previous 12 months of data calculated using the compliance option the facility is changing to unless the facility previously used an option that did not require the facility to maintain records of resin or gel coat. In this case the facility must immediately begin collecting resin and gel coat and demonstrate compliance 12 months after changing options. **(40 CFR 63.5810)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. For each cleaning operation, the permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. **(40 CFR 63.5805, Table 4)**
2. For each HAP-containing materials storage operation, the permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. **(40 CFR 63.5805, Table 4)**
3. For each mixing operation, the permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. **(40 CFR 63.5805, Table 4)**
4. For each mixing operation, the permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement. **(40 CFR 63.5805, Table 4)**
5. For each mixing operation, the permittee shall keep the mixer covers closed while actual mixing is occurring, except when adding materials or changing covers to the mixing vessels. **(40 CFR 63.5805, Table 4)**

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 HAP content of any resin, gelcoat, etc., as received and as applied, shall be determined using Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. Upon request of the AQD District Supervisor, the manufacturer's HAP formulation data shall be verified using EPA Test Method 311. Determinations of organic HAP content shall also be in compliance with the requirements specified in 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5797. **(40 CFR 63.5797)**

VI. MONITORING/RECORDKEEPING

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

1. Facilities meeting an organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance. **(40 CFR 63.5800)**
2. The permittee shall determine organic HAP emission factors in accordance with 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5910 and Table 1 for the purposes of compliance demonstration. **(40 CFR 63.5796)**
3. The permittee shall demonstrate compliance with the applicable standards in 40 CFR Part 63, Subpart WWW, by monitoring and keeping records in accordance with 40 CFR Part 63, Subpart WWW, 40 CFR 63.5895. **(40 CFR 63.5895)**
4. The permittee shall maintain records in accordance with 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5915. **(40 CFR 63.5915)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit the applicable notifications and reports by the dates specified in Table 13 and Table 14 to Subpart WWWW of 40 CFR Part 63, to the AQD in accordance with 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5905 and 40 CFR 63.5910, respectively. **(40 CFR Part 63, Subparts A and WWWW)**

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, Subparts A and WWWW, as they apply to FGCOMPOSITESMACT. **(40 CFR Part 63, Subparts A and WWWW)**

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).

FGMR3&4 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

North, Middle and South tank molds located in Mold Room 3&4.

Emission Units: EUMR3&4NORTHMOLD, EUMR3&4MIDMOLD, EUMR3&4SOUTHMOLD

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate more than one tank molding process in Mold Room 3&4 unless both exhaust fans are in operation.¹ **(R 336.1225)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVESESTACK-0004	36 ¹	60 ¹	R 336.1225 R 336.1901
2. SVESTACK-0005	36 ¹	60 ¹	R 336.1225 R 336.1901

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).

FGRULE290 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 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 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: EUSPRAYFOAM

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

1. Each emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively. **(R 336.1290(2)(a)(i))**
2. Any emission unit for which CO2 equivalent emissions are not more than 6,250 tons per month and for which the total uncontrolled or controlled emissions of all other air contaminants are not more than 1,000 or 500 pounds per month, respectively, and all the following criteria listed below are met: **(R 336.1290(2)(a)(ii))**
 - a. For toxic air contaminants, excluding noncarcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with initial threshold screening levels greater than or equal to 0.04 micrograms per cubic meter and less than 2.0 micrograms per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(2)(a)(ii)(A))**
 - b. For toxic air contaminants with initial risk screening levels greater than or equal to 0.04 microgram per cubic meter, the uncontrolled or controlled emissions shall not exceed 20 or 10 pounds per month, respectively. **(R 336.1290(2)(a)(ii)(B))**
 - c. The emission unit shall not emit any toxic air contaminants, excluding non-carcinogenic volatile organic compounds and noncarcinogenic materials which are listed in Rule 122(f) as not contributing appreciably to the formation of ozone, with an initial threshold screening level or initial risk screening level less than 0.04 microgram per cubic meter. **(R 336.1290(2)(a)(ii)(C))**
 - d. For total mercury, the uncontrolled or controlled emissions shall not exceed 0.01 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(D))**
 - e. For lead, the uncontrolled or controlled emissions shall not exceed 16.7 pounds per month from emission units installed on or after December 20, 2016. **(R 336.1290(2)(a)(ii)(E))**
3. Any emission unit that emits only particulate air contaminants without initial risk screening levels and other air contaminants that are exempted under Rule 290(2)(a)(i) or Rule 290(2)(a)(ii), if all the following provisions are met: **(R 336.1290(2)(a)(iii))**
 - a. The particulate emissions are controlled by an appropriately designed and operated fabric filter collector or an equivalent control system which is designed to control particulate matter to a concentration of less than or equal to 0.01 pound of particulate per 1,000 pounds of exhaust gases and which does not have exhaust gas flow rate more than 30,000 actual cubic feet per minute. **(R 336.1290(2)(a)(iii)(A))**
 - b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**

- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The provisions of Rule 290 apply to each emission unit that is operating pursuant to Rule 290. **(R 336.1290)**
2. The following requirements apply to emission units installed on or after December 20, 2016, utilizing control equipment:
 - a. An air cleaning device for volatile organic compounds shall be installed, maintained, and operated in accordance with the manufacturer's specifications. Examples include the following: **(R 336.1290(2)(b)(i), R 336.1910)**
 - i. Oxidizers and condensers equipped with a continuously displayed temperature indication device.
 - ii. Wet scrubbers equipped with a liquid flow rate monitor.
 - iii. Dual stage carbon absorption where the first canister is monitored for breakthrough and replaced if breakthrough is detected.
 - b. An air cleaning device for particulate matter shall be installed, maintained, and operated in accordance with the manufacturer's specifications or the permittee shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in the manner consistent with good air pollution control practices for minimizing emissions. It shall also be equipped to monitor appropriate indicators of performance, for example, static pressure drop, water pressure, and water flow rate. **(R 336.1290(2)(b)(ii), R 336.1910)**

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. 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 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
 - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). **(R 336.1213(3))**
 - e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in enough detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or

after December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor.

(R 336.1213(3), R 336.1290(2)(d))

- f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**
2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
 - a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(2)(c), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**
3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

See Appendix 4

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

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

Appendix 4. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements. Alternative formats must be approved by the AQD District Supervisor.

4.1 EUMOLDROOM1, EUMOLDROOM2, EUMR3&4NORTHMOLD, EUMR3&4MIDMOLD, EUMOLDROOM5, EUMOLDROOM6, EUTANKASSEMBLY, EUMR3&4SOUTHMOLD, EUTANKASSEMBLY2, EUTANKASSEMBLY3.

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EUMOLDROOM1, EUMOLDROOM2, EUMR3&4NORTHMOLD, EUMR3&4MIDMOLD, EUMR3&4SOUTHMOLD, EUMOLDROOM5, EUMOLDROOM6, EUTANKASSEMBLY, EUTANKASSEMBLY2, EUTANKASSEMBLY3.

1. The permittee shall keep the following information for the fiberglass molding processes:
 - a. Pounds of each lamination resin, gelcoat, tooling gelcoat and catalyst used on a calendar day, calendar month and 12-month rolling time period basis separately for EUMOLDROOM1, EUMOLDROOM2, EUMR3&4NORTHMOLD, EUMR3&4MIDMOLD, EUMR3&4SOUTHMOLD, EUMOLDROOM5, EUMOLDROOM6, EUTANKASSEMBLY, EUTANKASSEMBLY2, EUTANKASSEMBLY3.
 - b. Styrene and VOC mass emission calculations determining the daily emission rate in pounds per calendar day for EUMOLDROOM1, EUMOLDROOM2, EUMR3&4NORTHMOLD, EUMR3&4MIDMOLD, EUMR3&4SOUTHMOLD, EUMOLDROOM5, EUMOLDROOM6, EUTANKASSEMBLY, EUTANKASSEMBLY2, EUTANKASSEMBLY3.
 - c. Styrene mass emission calculations determining the average hourly emission rate in pounds per hour of operation for each calendar day separately for EUMOLDROOM1, EUMOLDROOM2, EUMR3&4NORTHMOLD, EUMR3&4MIDMOLD, EUMR3&4SOUTHMOLD, EUMOLDROOM5, EUMOLDROOM6, EUTANKASSEMBLY, EUTANKASSEMBLY2, EUTANKASSEMBLY3.
 - d. Styrene and 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 separately for EUMOLDROOM1, EUMOLDROOM2, EUMR3&4NORTHMOLD, EUMR3&4MIDMOLD, EUMR3&4SOUTHMOLD, EUMOLDROOM5, EUMOLDROOM6, EUTANKASSEMBLY, EUTANKASSEMBLY2, EUTANKASSEMBLY3.
 - e. Hours of operation for each calendar day separately for EUMOLDROOM1, EUMOLDROOM2, EUMR3&4NORTHMOLD, EUMR3&4MIDMOLD, EUMR3&4SOUTHMOLD, EUMOLDROOM5, EUMOLDROOM6, EUTANKASSEMBLY, EUTANKASSEMBLY2, EUTANKASSEMBLY3.

The records shall be kept in the formats specified in Attachments A, B and C, or an alternate format that has been approved by the AQD District Supervisor. (R 336.1201, R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)

4.2 – EUCLEANUP

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EUCLEANUP.

1. The permittee shall keep the following information for the use of cleanup and purge solvent:
 - a. Gallons of solvent used on a calendar month basis.
 - b. Gallons of solvent reclaimed on a calendar month basis.
 - c. Density, in pounds per gallon, of each solvent.
 - d. Mass emission calculations determining the acetone calendar month emission rate in tons per month.
 - e. Mass emission calculations determining the acetone annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in the format specified in Attachment D or an alternate format that has been approved by the AQD District Supervisor. **(R 336.1201, R 336.1224, R 336.1225)**

Attachment A

Emission Unit: _____, Date: _____
 Calendar Day Summary -- Styrene and VOC Process Emissions

GELCOATS	A	B	C	D_{ST}	D_{MMA}	E = (A x D_{ST}) / 2000	F = A x (D_{ST} + D_{MMA}) / 2000
GELCOAT DESCRIPTION (INCLUDING TOOLING GELCOATS)	GELCOAT USAGE (LB/DAY)	STYRENE CONTENT (% BY WEIGHT)	MMA CONTENT (% BY WEIGHT)	STYRENE EMISSION FACTOR PER ATTACHMENT E (LB/TON GELCOAT)	MMA EMISSION FACTOR PER ATTACHMENT E (LB/TON GELCOAT)	CALENDAR DAY STYRENE EMISSIONS (LB/DAY)	CALENDAR DAY VOC EMISSIONS (LB/DAY)
TOTAL POUNDS STYRENE EMITTED PER CALENDAR DAY FROM GELCOAT, G = (sum of all E's)						G	
TOTAL POUNDS VOC EMITTED PER CALENDAR DAY FROM GELCOAT, H = (sum of all F's)							H

SPRAY-APPLIED RESINS	I	J	K	L = (I x K) / 2000
RESIN DESCRIPTION	RESIN USAGE (LB/DAY)	STYRENE CONTENT (% BY WT)	STYRENE EMISSION FACTOR PER ATTACHMENT E (LB/TON RESIN)	CALENDAR DAY STYRENE/VOC EMISSIONS (LB/DAY)
TOTAL POUNDS STYRENE/VOC EMITTED PER CALENDAR DAY FROM RESIN, Q = (sum of all L's)				M

FILAMENT WINDING RESINS	M	N	O	P = (M x O) / 2000
RESIN DESCRIPTION	RESIN USAGE (LB/DAY)	STYRENE CONTENT (% BY WT)	STYRENE EMISSION FACTOR PER ATTACHMENT E (LB/TON RESIN)	CALENDAR DAY STYRENE/VOC EMISSIONS (LB/DAY)
TOTAL POUNDS STYRENE/VOC EMITTED PER CALENDAR DAY FROM RESIN, Q = (sum of all P's)				Q

CATALYSTS	R	S	T = (R x S) / 100
CATALYST DESCRIPTION	CATALYST USAGE (LB/DAY)	VOC* (% BY WEIGHT)	CALENDAR DAY VOC EMISSIONS (LB/DAY)
TOTAL POUNDS VOC EMITTED FROM CATALYST, U = (sum of all T's)			U

EMISSION UNIT HOURS OPERATION/CALENDAR DAY, V	V
--	----------

EMISSION UNIT TOTAL STYRENE EMITTED PER CALENDAR DAY, W = G + M + Q	W
--	----------

EMISSION UNIT TOTAL VOC EMITTED PER CALENDAR DAY, X = H + M + U	X
--	----------

EMISSION UNIT TOTAL STYRENE EMITTED PER HOUR, Y = W/V	Y
--	----------

***Determine voc content for catalyst (NOROX MEKP-925H FRED) as follows:**
 catalyst voc = 6% wt. (based on maximum methyl ethyl ketone and N-Methyl-2-pyrrolidone content per supplier msds)

Note: The other organic ingredients in the catalyst may be considered as either totally consumed in the cross-linking reactions or non-volatile, including methyl ethyl ketone peroxides and, 2,2,4-trimethylpentanediol-1,3-diisobutyrate. Also, hydrogen peroxide is not an organic compound as it contains no carbon and is not anticipated to be emitted.

Attachment B

Emission Unit: _____, Month/Year: ____/____
 Calendar Month Summary -- Styrene and VOC Process Emissions

GELCOATS	A	B	C	D _{ST}	D _{MMA}	E = (A x D _{ST}) / 2000	F = A x (D _{ST} +D _{MMA}) / 2000
GELCOAT DESCRIPTION (INCLUDING TOOLING GELCOATS)	GELCOAT USAGE (LB/Month)	STYRENE CONTENT (% BY WEIGHT)	MMA CONTENT (% BY WEIGHT)	STYRENE EMISSION FACTOR PER ATTACHMENT E (LB/TON GELCOAT)	MMA EMISSION FACTOR PER ATTACHMENT E (LB/TON GELCOAT)	CALENDAR MONTH STYRENE EMISSIONS (LB/Month)	CALENDAR MONTH VOC EMISSIONS (LB/Month)
TOTAL POUNDS STYRENE EMITTED PER CALENDAR MONTH FROM GELCOAT, G = (sum of all E's)						G	
TOTAL POUNDS VOC EMITTED PER CALENDAR MONTH FROM GELCOAT, H = (sum of all F's)							H

SPRAY APPLIED RESINS	I	J	K	L = (I x K) / 2000
RESIN DESCRIPTION	RESIN USAGE (LB/Month)	STYRENE CONTENT (% BY WEIGHT)	STYRENE EMISSION FACTOR PER ATTACHMENT E (LB/TON RESIN)	CALENDAR MONTH STYRENE/VOC EMISSIONS (LB/Month)
TOTAL POUNDS STYRENE/VOC EMITTED PER CALENDAR MONTH FROM RESIN, M = (sum of all L's)				M

FILAMENT WINDING RESINS	M	N	O	P = (M x O) / 2000
RESIN DESCRIPTION	RESIN USAGE (LB/Month)	STYRENE CONTENT (% BY WEIGHT)	STYRENE EMISSION FACTOR PER ATTACHMENT E (LB/TON RESIN)	CALENDAR MONTH STYRENE/VOC EMISSIONS (LB/Month)
TOTAL POUNDS STYRENE/VOC EMITTED PER CALENDAR MONTH FROM RESIN, Q = (sum of all P's)				Q

CATALYSTS	R	S	T = (R x S) / 100
CATALYST DESCRIPTION	CATALYST USAGE (LB/Month)	VOC* (% BY WEIGHT)	CALENDAR MONTH VOC EMISSIONS (LB/Month)
TOTAL POUNDS VOC EMITTED FROM CATALYST, U = (sum of all T's)			U

TOTAL TONS STYRENE EMITTED/CALENDAR MONTH, V = (G + M + Q) / 2000	V
---	----------

12-MONTH ROLLING PERIOD STYRENE (TONS), W = V + TOTAL OF 11 PREVIOUS MONTHS	W
---	----------

TOTAL TONS VOC EMITTED/CALENDAR MONTH, X = (H + M + Q + U) / 2000	X
---	----------

12-MONTH ROLLING PERIOD VOC (TONS), Y = X + TOTAL OF 11 PREVIOUS MONTHS	Y
---	----------

***Determine voc content for catalyst (NOROX MEKP-925H FRED) as follows:**

catalyst voc = 6% wt. (based on maximum methyl ethyl ketone and N-Methyl-2-pyrrolidone content per supplier msds)

Note: The other organic ingredients in the catalyst may be considered as either totally consumed in the cross-linking reactions or non-volatile, including methyl ethyl ketone peroxides and, 2,2,4-trimethylpentanediol-1,3-diisobutyrate. Also, hydrogen peroxide is not an organic compound as it contains no carbon and is not anticipated to be emitted.

Attachment C

Date: _____

TOTAL FACILITY-WIDE CALENDAR DAY STYRENE EMISSION RATE CALCULATION

	A
Emission Unit	Styrene Emission Rate (lbs/hr)
EUMOLDROOM1	
EUMOLDROOM2	
EUMR3&4NORTHMOLD	
EUMR3&4MIDMOLD	
EUMR3&4SOUTHMOLD	
EUMOLDROOM5	
EUMOLDROOM6	
EUTANKASSEMBLY	
EUTANKASSEMBLY2	
EUTANKASSEMBLY3	
TOTAL FACILITY-WIDE CALENDAR DAY STYRENE EMISSION RATE, B = (sum of all A's)	

Attachment D

Monthly Summary -- Cleanup/Purge Acetone Emissions

	A	B	C	D = B (A-C)
Month: Year: Date:	Actual Gallons of Acetone Used	Lbs per Gallon of Solvent	Gallons of Acetone Reclaimed	Lbs of Acetone Emitted
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
Total gallons used per month, E = (sum of all A's) E				
Total gallons reclaimed per month, F = (sum of all C's) F				
Total tons solvent emitted per month, G = (sum of all D's/2000) G				
12-month rolling period emissions (tons), H = (total of 11 previous months + E)/2000 H				

Attachment E

Styrene / MMA Emission Factors

1. The permittee shall use styrene and MMA emission factors and/or calculations from 'EF Table 1: Unified Emission Factors for Open Molding of Composites', as revised and approved on October 13, 2009, for calculating emissions.

Appendix 5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. 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-N3748-2017. 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-N3748-2017c is being reissued as Source-Wide PTI No. MI-PTI-3748-2021a.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)						
93-18	201800119 / December 18, 2018	<p>Incorporate PTI No. 93-18, which is to use resins containing a vapor suppressant, usually a wax, that inhibits the emissions of certain pollutants, the most relevant for this application being styrene (CAS No. 100-42-5). PTI No. 93-18 removes one material limit and the modification of two restrictions on resins containing 45% styrene due to the emissions profile of the proposed resin. The proposed resin would be used in all emission units at the facility and is planned to replace the existing 35% styrene resin. The 45% resin is being requested due to its increased corrosion and high temperature resistance over the 35% resin.</p> <p>40 CFR Part 63, Subpart WWWW, Appendix A, provides a test method for determining the vapor suppressant effectiveness factor for a particular resin. The Company submitted test results provided by the supplier stating the resin emissions for different application processes in lbs. styrene / ton of resin applied. The application processes were Manual, Non-Atomized Mechanical, and Filament Winding and the respective emission factors for the proposed resin are in the following table:</p> <table border="1" data-bbox="613 1753 1096 1911"> <thead> <tr> <th>Manual</th> <th>Non-Atomized Mechanical</th> <th>Filament Winding</th> </tr> </thead> <tbody> <tr> <td>104 lbs / ton</td> <td>78 lbs / ton</td> <td>118 lbs / ton</td> </tr> </tbody> </table>	Manual	Non-Atomized Mechanical	Filament Winding	104 lbs / ton	78 lbs / ton	118 lbs / ton	<p>EUMOLDROOM1 EUMOLDROOM2 EUMR3&4NORTHMOLD EUMR3&4MIDMOLD EUMR3&4SOUTHMOLD EUMOLDROOM5 EUTANKASSEMBLY EUTANKASSEMBLY2 FG FACILITY</p>
Manual	Non-Atomized Mechanical	Filament Winding							
104 lbs / ton	78 lbs / ton	118 lbs / ton							

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
		<p>The following conditions were modified to allow for the use of the 45% vapor-suppressed resins:</p> <ul style="list-style-type: none"> • EUTANKASSEMBLY, SC II.1, Material Limit of 35 weight% styrene • EUTANKASSEMBLY2, SC II.1, Material Limit of 35 weight% styrene • FGFACILITY, SC II.3 limiting the amount of 45 weight% styrene resin to 160,000 lbs / year <p>Since the resin is being used in all emission units, it was considered a modification of those emission units and each were reevaluated.</p> <p>The facility is a major source of HAPs. PTI No. 93-18 did not have any changes to any emission limits; therefore, the status of the facility will remain unchanged after the modification.</p>	
93-18A	201900042 / June 17, 2019	<p>Incorporate PTI No. 93-18A, which is to install three new mold rooms (EUMOLDSTATION9, EUMOLDSTATION10 and EUMOLDSTATION11) to be located at 701 Reed Street, which is approximately 1,000 feet West of the existing facility location at 200 North Gooding Street.</p> <p>It was determined that the Reed Street location and emission units would be part of the same source and have the same State Registration Number (N3748) as the existing facility.</p> <p>The new mold stations consist of wheeled chop/wetout assemblies used to produce fiberglass parts on stationary molds. Two identical stacks, SVMRWSSTACK8 and CRMRWNSTACK9, will vent emissions from the 701 Reed Street location.</p> <p>The existing emission units and facility wide emission limits were not modified in PTI No. 93-18A. Additionally, PTI No. 93-18A was not required to go through the public participation process.</p>	EUMOLDROOM1 EUMOLDROOM2 EUMR3&4NORTHMOLD EUMR3&4MIDMOLD EUMR3&4SOUTHMOLD EUMOLDROOM5 EUTANKASSEMBLY EUTANKASSEMBLY2 EUMOLDSTATION9 EUMOLDSTATION10 EUMOLDSTATION11 FGCOMPOSITESMACT FGFACILITY
93-18B	202000169 / January 28, 2021	<p>Incorporate PTI No. 93-18B, which was for the three emission units (EUMOLDSTATION9, EUMOLDSTATION10, and EUMOLDSTATION11) that were permitted in PTI No. 93-18A and rolled into</p>	SOURCE-WIDE EUMOLDSTATION9 EUMOLDSTATION10 EUMOLDSTATION11

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
		the existing ROP. However, construction of the three new mold rooms did not begin within 18 months of permit issuance and had to resubmit a PTI application for the mold rooms. The mold rooms being permitted in this PTI are very similar to what was permitted in PTI No. 93-18A. However, FGFACILITY in the ROP was moved to Part B. Source-Wide Conditions since the Conditions apply to the entire Stationary Source. FGFACILITY references and Conditions under Part D. of the ROP were removed.	

The following table lists the ROP amendments or modifications issued after the effective date of ROP No. MI-ROP-N3748-2021

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
82-23	202300108 / September 21, 2023	Incorporate PTI No. 82-23 into the ROP, which was for modifying an existing fiberglass tank mold room, a new fiberglass tank mold room, and a new take assembly area. This PTI was not required to go through the Public Participation process. References to emission units EUMOLDSTATION9, EUMOLDSTATION10, and EUMOLDSTATION11 were removed because they were never installed at the source.	EUMOLDROOM5 EUMOLDROOM6 EUTANKASSEMBLY3 FGCOMPOSITESMACT Source-Wide Conditions

Appendix 7. Emission Calculations

The permittee shall use Attachments A, B, C, D and E of Appendix 4 for calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in SOURCE-WIDE CONDITIONS, EUMOLDROOM1, EUMOLDROOM2, EUMR3&4MIDMOLD, EUMR3&4NORTHMOLD, EUMR3&4SOUTHMOLD, EUMOLDROOM5, EUMOLDROOM6, EUTANKASSEMBLY, EUTANKASSEMBLY2, EUTANKASSEMBLY3, and EUCLEANUP.

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.