

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

EFFECTIVE DATE: July 8, 2015
REVISION DATE: January 16, 2020

ISSUED TO

BREMBO NORTH AMERICA, INC.

State Registration Number (SRN): N6226

LOCATED AT

29991 M-60 East, Homer, Michigan 49245

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

Administratively Complete ROP Renewal Application Due Between
January 8, 2019 and January 8, 2020

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N6226-2015a

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

Michigan Department of Environment, Great Lakes, and Energy

Rex Lane, Kalamazoo District Supervisor

TABLE OF CONTENTS

AUTHORITY AND ENFORCEABILITY 3

A. GENERAL CONDITIONS..... 4

Permit Enforceability 4

General Provisions..... 4

Equipment & Design 5

Emission Limits 5

Testing/Sampling 5

Monitoring/Recordkeeping 6

Certification & Reporting 6

Permit Shield 7

Revisions 8

Reopenings..... 8

Renewals..... 8

Stratospheric Ozone Protection 9

Risk Management Plan 9

Emission Trading 9

Permit To Install (PTI) 9

B. SOURCE-WIDE CONDITIONS 11

C. EMISSION UNIT CONDITIONS 12

EMISSION UNIT SUMMARY TABLE 12

D. FLEXIBLE GROUP CONDITIONS..... 16

FLEXIBLE GROUP SUMMARY TABLE 16

FG-GeoMet..... 18

FG-BMG 21

FG-Zinc..... 24

FG-COATINGLINES 28

FG-MACT MMMM..... 31

FG-COLDCLEANERS 35

E. NON-APPLICABLE REQUIREMENTS 37

APPENDICES 38

Appendix 1. Acronyms and Abbreviations 38

Appendix 2. Schedule of Compliance..... 39

Appendix 3. Monitoring Requirements 39

Appendix 4. Recordkeeping 39

Appendix 5. Testing Procedures 39

Appendix 6. Permits to Install..... 39

Appendix 7. Emission Calculations 40

Appendix 8. Reporting 40

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 are state-only enforceable will be noted as such.

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

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

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

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 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.The grading of visible emissions shall be determined in accordance with Rule 303.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

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

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

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))**

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

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

Revisions

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

Reopenings

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

Renewals

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

Brembo North America - Disc. Plant

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the 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 82Subpart 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 Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
 - a. June 21, 1999,
 - b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - c. The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

Emission Trading

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

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8) Section 5510 of Act 451)**

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

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.

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-GeoMet-01	The HVLP spray guns apply the coating to multiple surfaces of automotive brake products. One paint booth applies paint product to the surfaces. Brake rotors or drums are heated using an oven after the coating has been applied. Associated flash-off areas/drying area allow the brake products to dry or cure. Dry filters are used to collect any overspray from the coating process.	09-01-09	FG-GeoMet FG-COATINGLINES FG-MACT MMMM
EU-GeoMet-02	The HVLP spray guns apply the coating to multiple surfaces of automotive brake products. One paint booth applies paint product to the surfaces. Brake rotors or drums are heated using an oven after the coating has been applied. Associated flash-off areas/drying area allow the brake products to dry or cure. Dry filters are used to collect any overspray from the coating process.	11-01-11	FG-GeoMet FG-COATINGLINES FG-MACT MMMM
EU-GeoMet-03	HVLP spray guns apply the coating to multiple surfaces of automotive brake products. One paint booth applies paint product to the surfaces. Brake rotor or drums are heated using an oven after the coating has been applied. Associated flash-off areas/drying area allow the brake products to dry or cure. Dry filters are used to collect any overspray from the coating process.	8-15-2016	FG-BMG FG-COATINGLINES FG-MACT MMMM

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-Black (Sprimag Black)	Brake rotors or drums are pre-heated using a single induction unit and HVLP spray guns apply the coating to multiple surfaces of automotive brake products. Coating line applies coating to several surfaces on brake rotors and brake drums. A paint booth applies paint product to the surfaces and associated flash-off area/drying area that allow the brake products to dry or cure. Dry filters are used to collect any overspray from the coating process.	09-01-01	FG-BMG FG-COATINGLINES FG-MACT MMMM
EU-Zinc-01	Brake rotors or drums are pre-heated using a single induction unit and HVLP spray guns apply the coating to multiple surfaces of automotive brake products. The coating line applies coating to several surfaces on brake rotors and brake drums. A paint booth applies paint product to the surfaces and associated flash-off area/drying area that allow the brake products to dry or cure. Dry filters are used to collect any overspray from the coating process.	02-01-01	FG-Zinc FG-COATINGLINES FG-MACT MMMM
EU-Zinc-02 (Sprimag Zinc)	The HVLP spray guns apply the coating to multiple surfaces of automotive brake products. A paint booth applies paint product to the surfaces. Brake rotors or drums are heated using an oven after the coating has been applied. Associated flash-off areas/drying area allow the brake products to dry or cure. Dry filters are used to collect any overspray from the coating process.	07-01-06	FG-Zinc FG-COATINGLINES FG-MACT MMMM
EU-Zinc-03 (Brentro 01)	Brake rotors or drums are pre-heated using an oven and HVLP spray guns apply the coating to multiple surfaces of automotive brake products. The coating line applies coating to several surfaces on brake rotors and brake drums. A paint booth applies paint product to the surfaces and associated flash-off area/drying area that allow the brake products to dry or cure. Dry filters are used to collect any overspray from the coating process.	07-01-06	FG-Zinc FG-COATINGLINES FG-MACT MMMM

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-Zinc-04 (Brentro 02)	Brake rotors or drums are pre-heated using an oven and HVLP spray guns apply the coating to multiple surfaces of automotive brake products. The coating line applies coating to several surfaces on brake rotors and brake drums. A paint booth applies paint product to the surfaces and associated flash-off area/drying area that allow the brake products to dry or cure. Dry filters are used to collect any overspray from the coating process.	05-01-09	FG-Zinc FG-COATINGLINES FG-MACT MMMM
EU-Zinc-05	Brake rotors or drums are pre-heated and dried following coating application, using electric induction heaters. The coating application is done in a spray booth using robotic HVLP spray applicators to apply coatings to multiple surfaces of automotive brake products. The spray booth will be equipped with dry filters to collect any overspray.	12-18-13	FG-Zinc FG-COATINGLINES FG-MACT MMMM
EU-Zinc-06	Brake rotor or drums are pre-heated, and dried following coating application, using electric induction heaters. The coating application is done in a spray booth using robotic HVLP spray applicators to apply coatings to multiple surfaces of automotive brake products. The spray booth will be equipped with dry filters to collect any overspray.	TBD	FG-Zinc FG-COATINGLINES FG-MACT MMMM
EU-Magni-01	Brake rotors or drums are pre-heated using an oven and HVLP spray guns apply the coating to multiple surfaces of automotive brake products. The coating line applies coating to several surfaces on brake rotors and brake drums. A paint booth applies paint product to the surfaces and associated flash-off area/drying area that allow the brake products to dry or cure. Dry filters are used to collect any overspray from the coating process.	05-01-10	FG-BMG FG-COATINGLINES FG-MACT MMMM
EU-Magni-02	Brake rotors or drums are pre-heated using an oven and HVLP spray guns apply the coating to multiple surfaces of automotive brake products. The coating line applies coating to several surfaces on brake rotors and brake drums. A paint booth applies paint product to the surfaces and associated flash-off area/drying area that allow the brake products to dry or cure. Dry filters are used to collect any over spray from the coating process.	08-01-11	FG-BMG FG-COATINGLINES FG-MACT MMMM

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-Magni-03	Brake rotors or drums are pre-heated and dried following coating application, using electric induction heaters. The coating application is done in a spray booth using robotic HVLP spray applicators to apply coatings to multiple surfaces of automotive brake products. The spray booth will be equipped with dry filters to collect any overspray.	11-20-13	FG-BMG FG-COATINGLINES FG-MACT MMMM
EU-Magni-04	Brake rotors or drums are pre-heated and dried following coating application, using electric induction heaters. The coating application is done in a spray booth using robotic HVLP spray applicators to apply coatings to multiple surfaces of automotive brake products. The spray booth will be equipped with dry filters to collect any overspray.	12-18-13	FG-BMG FG-COATINGLINES FG-MACT MMMM
EU-Magni-05	Brake rotors or drums are pre-heated and dried following coating application, using electric induction heaters. The coating application is done in a spray booth using robotic HVLP spray applicators to apply coatings to multiple surfaces of automotive brake products. The spray booth will be equipped with dry filters to collect any overspray.	04-01-14	FG-BMG FG-COATINGLINES FG-MACT MMMM
EU-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h), or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	02-01-01	FG-COLDCLEANERS

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-GeoMet	Two automotive metal surface coating lines.	EU-GeoMet-01 EU-GeoMet-02
FG-BMG	Seven (7) automotive metal surface coating lines.	EU-GeoMet-03 EU-Black EU-Magni-01 EU-Magni-02 EU-Magni-03 EU-Magni-04 EU-Magni-05
FG-Zinc	Six automotive metal surface coating lines.	EU-Zinc-01 EU-Zinc-02 EU-Zinc-03 EU-Zinc-04 EU-Zinc-05 EU-Zinc-06
FG-COATINGLINES	Fifteen (15) automotive metal surface coating lines.	EU-GeoMet-01 EU-GeoMet-02 EU-GeoMet-03 EU-Black EU-Magni-01 EU-Magni-02 EU-Magni-03 EU-Magni-04 EU-Magni-05 EU-Zinc-01 EU-Zinc-02 EU-Zinc-03 EU-Zinc-04 EU-Zinc-05 EU-Zinc-06

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-MACT MMMM	<p>Each new, reconstructed, and existing affected source described in 40 CFR 63.3881(a)(1), including the subcategories listed in 40 CFR, Part 63, Subpart MMMM, 63.3881(a)(2) through (6), meeting the applicability requirements of 40 CFR 63.3881(b), which is engaged in the surface coating of miscellaneous metal parts and products. The affected source includes the collection of all the items listed in 40 CFR 63.3882(b)(1) through (4). Surface coating is defined by 40 CFR 63.3881 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating. The 40 CFR, Part 63, Subpart MMMM, does not apply to surface coating or a coating operation that meets any of the criteria of 40 CFR 63.3881(c)(1) through (17).</p>	<p>EU-GeoMet-01 EU-GeoMet-02 EU-GeoMet-03 EU-Black EU-Magni-01 EU-Magni-02 EU-Magni-03 EU-Magni-04 EU-Magni-05 EU-Zinc-01 EU-Zinc-02 EU-Zinc-03 EU-Zinc-04 EU-Zinc-05 EU-Zinc-06</p>
FG-COLDCLEANERS	<p>Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 281(h), or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.</p>	<p>EU-COLDCLEANERS</p>

**FG-GeoMet
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Two automotive metal surface coating lines.

Emission Units: EU-GeoMet-01, EU-GeoMet-02

POLLUTION CONTROL EQUIPMENT

Dry filters are used to collect any overspray from the coating process.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	2,000 pounds per month ²	Calendar month	Each EU of FG-GeoMet	SC VI.1 through SC VI.3	R 336.1702(d)
2. VOCs	10.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	Each EU of FG-GeoMet	SC VI.1 through SC VI.3	R 336.1702(d)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste coatings, cleanup and purge solvents (materials) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1702(a))**
2. 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)**
3. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1205, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FG-GeoMet unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.² **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain FG-GeoMet with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702(a))**

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall 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 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, cleanup and purge solvents, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a calendar day basis for FG-GeoMet:
 - a. Gallons (with water) of each coating, cleanup and purge solvents (material) used and reclaimed.
 - b. VOC content (with water) of each material as applied.
 - c. VOC mass emission calculations determining the monthly emission rate in pounds per calendar month for each EU of FG-GeoMet.
 - d. 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 for FG-GeoMet.

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

VII. REPORTING

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

See Appendix 8

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

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. SV0042 <i>(Paint Booth, EU-GeoMet-01)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV0043 <i>(Paint Booth, EU-GeoMet-01)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV0045 <i>(Cure Station, EU-GeoMet-01)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV0046 <i>(Exhaust, EU-GeoMet-01)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV0047 <i>(Exhaust, EU-GeoMet-01)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
6. SV0053 <i>(Paint Booth, EU-GeoMet-02)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
7. SV0054 <i>(Paint Booth, EU-GeoMet-02)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
8. SV0057 <i>(Paint Booth, EU-GeoMet-02)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
9. SV0058 <i>(Paint Booth, EU-GeoMet-02)</i>	20 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 A and Subpart M for Surface Coating of Miscellaneous Metal Parts and Products.² **(40 CFR Part 63 Subparts A and M)**

Footnotes:

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

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

**FG-BMG
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Seven (7) automotive metal surface coating lines.

Emission Unit: EU-GeoMet-03, EU-Black, EU-Magni-01, EU-Magni-02, EU-Magni-03, EU-Magni-04, EU-Magni-05

POLLUTION CONTROL EQUIPMENT

Dry filters are used to collect any overspray from the coating process.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	6.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	Each EU of FG-BMG	SC VI.2, SC VI.3	R 336.1702(a)
2. VOCs	42.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	Each EU of FG-BMG	SC VI.2, SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	3.5 lb/gal (minus water) ^a as applied ²	Instantaneous	FG-BMG	SC V.1, SC VI.2	R 336.1702(a)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste coatings, cleanup and purge solvents (materials) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1702(a))**
2. 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)**
3. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1205, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FG-BMG unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.² **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain FG-BMG with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702(a))**

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall 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 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, cleanup and purge solvents, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a calendar month basis for FG-BMG, and for each individual emission unit in FG-BMG:
 - a. Gallons (with water) of each coating, cleanup and purge solvents (material) used and reclaimed.
 - b. VOC content (minus water and with water) of each material as applied.
 - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.² **(R 336.1702(a))**

VII. REPORTING

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

See Appendix 8

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

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. SV0021 (Exhaust, EU-Black)	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV0052 (Exhaust, EU-Magni-01)	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV0068 (Exhaust, EU-Magni-02)	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV0063 (Exhaust, EU-Magni-03)	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV0064 (Exhaust, EU-Magni-04)	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
6. SV0065 (Exhaust, EU-Magni-05)	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
7. SV0066 (Exhaust, EU-GeoMet-03)	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
8. SV0067 (Exhaust, EU-GeoMet-03)	20 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 A and Subpart Mmmm for Surface Coating of Miscellaneous Metal Parts and Products.² **(40 CFR Part 63, Subparts A and Mmmm)**

Footnotes:

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

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

**FG-Zinc
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Six automotive metal surface coating lines.

Emission Units: EU-Zinc-01, EU-Zinc-02, EU-Zinc-03, EU-Zinc-04, EU-Zinc-05, EU-Zinc-06

POLLUTION CONTROL EQUIPMENT

Dry filters are used to collect any overspray from the coating process.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	15.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	Each EU in FG-Zinc	SC V.1, SC VI.2, SC VI.3	R 336.1702(a)
2. VOCs	62.6 tpy ²	12-month rolling time period as determined at the end of each calendar month	Each EU in FG-Zinc	SC V.1, SC VI.2, SC VI.3	R 336.1702(a)
3. Ethylbenzene (CAS No. 100-41-4)	4.68 tpy ¹	12-month rolling time period as determined at the end of each calendar month	Each EU in FG-Zinc	SC VI.2, SC VI.4	R 336.1225(2)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	11.0 pounds per gallon of applied coating solids ²	Calendar day	Each EU in FG-Zinc	SC V.1, SC V.2, SC VI.5	R 336.1702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste coatings, cleanup and purge solvents (materials) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1224, R 336.1225, R 336.1702(a))**
2. 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)**
3. The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

covered at all times except when operator access is necessary.² (R 336.1205, R 336.1224, R 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FG-Zinc unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.² (R 336.1224, R 336.1301, R 336.1910)
2. The permittee shall equip and maintain FG-Zinc with HVLP applicators or comparable technology with a minimum transfer efficiency of 70.0 percent. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² (R 336.1702(a))

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² (R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))
2. At least once every three (3) years from the most recent performance test, the permittee shall verify the transfer efficiency of each emission unit in FG-Zinc, by testing at owner's expense, in accordance with Department requirements and R 336.2040(9). In addition, using the data contained in these test results, the permittee shall demonstrate compliance with the pounds of VOC per gallon of applied coating solids (GACS) emission limitations specified in SC II.1 for each emission unit in FG-Zinc.² (R 336.1225, R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(9))
 - a. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing.
 - b. Verification of transfer efficiency and the pounds of VOC per gallon of applied coating solids (GACS) emission limitations specified in SC II.1 for each emission unit in FG-Zinc includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. Applicable baseline operating parameters listed in R 336.2040(9)(p) shall be included with the test report.
 - c. The permittee shall review the operating conditions annually after the initial test and demonstrate to the Department that significant changes have not occurred in coating technology, the parts coated, or the processing sequence. The most recent test results shall remain valid until the next scheduled test if the permittee demonstrates that significant change has not occurred. Significant product, processing, material, or application equipment changes shall necessitate retesting of the transfer efficiency. The retesting shall be done as soon as practicable, but not more than 180 days after the start-up and stabilization of the new product, process, material, or application equipment. New transfer efficiency values determined by the retest shall be used retroactively to the start-up of the new product, process, material, or application equipment.

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 336.1225, R 336.1702)
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, cleanup and purge solvents, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1225, R 336.1702)

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

3. The permittee shall keep the following information on a calendar month basis for FG-Zinc, and for each emission unit in FG-ZINC:
 - a. Gallons (with water) of each coating, cleanup and purge solvents (material) used and reclaimed.
 - b. VOC content (minus water and with water) of each material as applied.
 - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.² **(R 336.1702(a))**

4. The permittee shall keep the following information on a calendar month basis for FG-Zinc:
 - a. Gallons of each ethylbenzene (CAS No. 100-41-4) containing material used and reclaimed.
 - b. The ethylbenzene (CAS No. 100-41-4) content in pounds per gallon of each material used.
 - c. Ethylbenzene (CAS No. 100-41-4) mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. Ethylbenzene (CAS No. 100-41-4) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

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

5. The permittee shall keep daily usage, VOC, solids content, transfer efficiency, and emissions calculations records for each emission unit in FG-Zinc. The records shall be kept in a format acceptable to the AQD District Supervisor, and as a minimum, shall indicate the following for each emission unit in FG-Zinc:
 - a. The coating(s) used in each spray booth.
 - b. The daily usage rate of each material (in gallons – with water).
 - c. The calculated daily VOC content of each coating material (in pounds of VOC per gallon, as applied).
 - d. The calculated daily solids content, by volume, of each coating material (in gallons solids per gallon coating, as applied).
 - e. The calculated total pounds of VOCs emitted on a daily basis.
 - f. The calculated total gallons of solids applied on a daily basis.
 - g. The calculated daily VOC emission rate in pounds per gallon of applied coating solids.

Calculations of daily values shall be completed on a monthly basis, by the 15th day of the calendar month, for the previous calendar month. All such records are for the purpose of compliance demonstration. All records shall be kept on file and made available to the Department upon request.² **(R 336.1702(a))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification of FG-Zinc, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-Zinc-06.² **(R 336.1201(7)(a))**

Brembo North America - Disc. Plant

- The permittee shall review operating conditions of FG-Zinc on an annual basis, as required by SC V.2. As part of the review, the permittee shall document any product, processing, material, or application equipment changes, or changes to baseline operating parameters that were established during the transfer efficiency test. The permittee shall conduct the review by December 12 of each year, and submit an annual report to the AQD District Supervisor in an acceptable format within 30 days following the date the review was conducted.² **(R 336.1702(a), R 336.2040(9)(p))**

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. SV0026 <i>(Exhaust, EU-Zinc-01)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV0022 <i>(Spray Station, EU-Zinc-02)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
3. SV0023 <i>(Flash Off, EU-Zinc-02)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV0025 <i>(Cooling Zone, EU-Zinc-02)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV0048 <i>(Exhaust, EU-Zinc-03)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
6. SV0059 <i>(Exhaust, EU-Zinc-04)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
7. SV0061 <i>(Spray Station, EU-Zinc-05)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)
8. SV-Zinc-06 <i>(Exhaust, EU-Zinc-06)</i>	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart M for Surface Coating of Miscellaneous Metal Parts and Products.² **(40 CFR Part 63 Subparts A and M)**

Footnotes:

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

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

**FG-COATINGLINES
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Fifteen (15) automotive metal surface coating lines.

Emission Unit: EU-GeoMet-01, EU-GeoMet-02, EU-GeoMet-03, EU-Black, EU-Magni-01, EU-Magni-02, EU-Magni-03, EU-Magni-04, EU-Magni-05, EU-Zinc-01, EU-Zinc-02, EU-Zinc-03, EU-Zinc-04, EU-Zinc-05, EU-Zinc-06

POLLUTION CONTROL EQUIPMENT

Dry filters are used to collect any overspray from the coating process.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	62.6 tpy ²	12-month rolling time period as determined at the end of each calendar month	FG-COATINGLINES	SC VI.2, SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall capture all waste coatings, cleanup and purge solvents (materials) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.² **(R 336.1702(a))**
- 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)**
- The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1205, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall not operate FG-COATINGLINES unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.² **(R 336.1224, R 336.1301, R 336.1910)**
- The permittee shall equip and maintain FG-COATINGLINES with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702(a))**

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

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 336.1225, R 336.1702)
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, cleanup and purge solvents, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1225, R 336.1702)
3. The permittee shall keep the following information on a calendar month basis for FG-COATINGLINES:
 - a. Gallons (with water) of each coating, cleanup and purge solvents (material) used and reclaimed.
 - b. VOC content (with water) of each material as applied.
 - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month for FG-COATINGLINES.
 - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor and make them available to the Department upon request.² (R 336.1702(d))

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

- 1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart M for Surface Coating of Miscellaneous Metal Parts and Products.² (40 CFR Part 63, Subparts A and M)**

Footnotes:

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

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

**FG-MACT MMMM
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

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

Emission Units: EU-GeoMet-01, EU-GeoMet-02, EU-GeoMet-03, EU-Black, EU-Magni-01, EU-Magni-02, EU-Magni-03, EU-Magni-04, EU-Magni-05, EU-Zinc-01, EU-Zinc-02, EU-Zinc-03, EU-Zinc-04, EU-Zinc-05, EU-Zinc-06

POLLUTION CONTROL EQUIPMENT

Dry filters are used to collect any overspray from the coating process.

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

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

* Determined according to 40 CFR 63.3941(a).

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

Brembo North America - Disc. Plant

- c. Emission rate with add-on controls option.

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

2. Any coating operation(s) using the compliant material option or the emission rate without add-on controls option, shall be in compliance with the applicable emission limits in 40 CFR 63.3890 at all times.² **(40 CFR 63.3900(a)(1))**
3. If the surface coating operation(s) meet the applicability criteria of more than one of the subcategory emission limits specified in 40 CFR 63.3890(a) or (b), the permittee may comply separately with each subcategory emission limit, or comply using one of the alternatives in 40 CFR 63.3890(c)(1) or (2).² **(40 CFR 63.3890(c))**

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 conduct an initial compliance demonstration for the initial compliance period according to the requirements in 40 CFR 63.3941, 40 CFR 63.3951, or 40 CFR 63.3961. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first of the month, then the compliance period extends through that month plus the next 12 months.² **(40 CFR 63.3940, 40 CFR 63.3950, 40 CFR 63.3960)**
2. The permittee shall keep all records required by 40 CFR 63.3930 in the format and timeframes outlined in 40 CFR 63.3931.² **(40 CFR 63.3942(d), 40 CFR 63.3952(d), 40 CFR 63.3963(j))**
3. The permittee shall maintain, at a minimum, the following records for each compliance period²:
- A copy of each notification and report that is submitted to comply with Subpart Mmmm, and the documentation supporting each notification and report. **(40 CFR 63.3930(a))**
 - A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density of each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. **(40 CFR 63.3930(b))**
 - A list of the coating operations on which each compliance option was used, and the beginning and ending dates and times for each compliance option used. **(40 CFR 63.3930(c)(1))**
 - For the compliant materials option, the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941. **(40 CFR 63.3930(c)(2))**
 - For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C and 2 of 40 CFR 63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951. **(40 CFR 63.3930(c)(3))**
 - The name and mass or volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the compliant material option is used for all coatings at the affected

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

- source, the permittee may maintain purchase records for each material used rather than a record of the volume used. **(40 CFR 63.3930(d))**
- g. The mass fraction of organic HAP for each coating, thinner and/or additive, and cleaning material used during each compliance period unless the material is tracked by weight. **(40 CFR 63.3930(e))**
 - h. The volume fraction of coating solids for each coating used during each compliance period. **(40 CFR 63.3930(f))**
 - i. The density of for each coating, thinner and/or other additive, and cleaning material used during each compliance period. **(40 CFR 63.3930(g))**
 - j. The information specified in 40 CFR 63.3930(h)(1) through (3), if an allowance is used in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4). **(40 CFR 63.3930(h))**
 - k. The date, time, and duration of each deviation. **(40 CFR 63.3930(j))**
4. For each coating used for the compliant coating option, the permittee shall demonstrate continuous compliance with the emission limit in 40 CFR 63.3890, for each compliance period, using Equation 2 of 40 CFR 63.3941. For each thinner and cleaning material used, the permittee shall determine continuous compliance according to 40 CFR 63.3941(a).² **(40 CFR 63.3942)**
 5. For any coating operation or group of coating operations using the emission rate without add-on controls option, the permittee shall demonstrate continuous compliance with the applicable organic HAP emission limit in 40 CFR 63.3890, for each compliance period, according to 40 CFR 63.3951(a) through (g).² **(40 CFR 63.3952)**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. For the compliant material option, if any coating used for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890; or any thinner or cleaning material used contains any organic HAP, the permittee shall report this as a deviation as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(5).² **(40 CFR 63.3942(b))**
5. For the emission rate without add-on controls, if the organic HAP emission rate for any 12-month compliance period exceeds the applicable emission limit specified in 40 CFR 63.3890, the permittee shall report this as a deviation as specified in 40 CFR 63.3910(c)(6) and 40 CFR 63.3920(a)(6).² **(40 CFR 63.3952(b))**
6. The Permittee shall submit the applicable notifications specified in 40 CFR 63.7(b) and (c), 63.8(f)(4) and 63.9(b) through (e) and (h), an initial notification and a notification of compliance status as specified in 40 CFR 63.3910.² **(40 CFR Part 63 Subparts A and MMMM)**
7. The permittee shall submit all semiannual compliance reports specified in 40 CFR 63.3920(a). Each semiannual compliance report shall identify which coating operation(s) used each compliance option, and if there were no deviations from the emission limitations in 40 CFR 63.3890, include a statement that the coating operations were in compliance.² **(40 CFR 63.3920, 40 CFR 63.3942(c), 40 CFR 63.3952(c), 40 CFR 63.3963(f))**

See Appendix 8

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart M for Surface Coating of Miscellaneous Metal Parts and Products by the initial compliance date.² **(40 CFR Part 63 Subparts A and M)**

Footnotes:

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

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

**FG-COLDCLEANERS
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

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

Emission Unit: EU-COLDCLEANERS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

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

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner **(R 336.1213(3))**:
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1. Acronyms and Abbreviations

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

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

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

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

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTI and/or Operate that relate to the identified emission units or flexible groups as of the effective date of this ROP. This includes all PTI and/or Operate that are hereby incorporated into Source-Wide PTI No. MI-PTI-N6226-2015. The PTIs issued after the effective date of this ROP, including amendments or modifications, will be identified in Appendix 6 upon renewal.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
145-12A	Thirteen automotive metal surface coating lines.	FG-GeoMet FG-Magni&Black FG-Zinc FG-MISCMETAL FG-MACT MMMM

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-N6226-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
145-12B	201800084 / January 16, 2020	Incorporate PTI 145-12B into the ROP which was to add two paint lines ("GeoMet 3" and "Zinc 6"), and to change the VOC emission limits for existing flexible groups in the ROP for their disk coating plant. Additionally, FG-Magni&Black was	EU-GeoMet-03 EU-Zinc-06 FG-GeoMet FG-BMG FG-Zinc FG-COATINGLINES

Brembo North America - Disc. Plant

ROP No: MI-ROP-N6226-2015a

Expiration Date: July 8, 2020

PTI No: MI-PTI-N6226-2015a

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
		changed to FG-BMG, and FG-COATINGLINES was added to cover all the coating lines at the facility, therefore, FG-MISCMETAL was removed from the ROP since it only covered two emission units that were limited to 10 tons per year each, and was less than the 30 tons per year for "all metal parts coating lines per R 336.1621(10)(b). PTI 145-12B was not required to go through the public participation process.	FG-MACT MMMM

Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible group Special Conditions. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the 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.