EGLE

RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

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

GENERAL INSTRUCTIONS

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

PART A: GENERAL INFORMATION

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

SOURCE INFORMATION

SRN	SIC Code	NAICS Code	Existing ROP Number	Section Number (if applicable)
N6950	3711	336111	MI-ROP-N6950-2020a	1

Source Name: General Motors LLC Lansing Delta Township

Street Address: 8175 Millett Highway

City	State	ZIP Code	County
Lansing	MI	48917	Eaton

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

Source Description: Automobile Manufacturing Facility

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

OWNER INFORMATION

Owner Name	Section Number (if applicable)
General Motors LLC	1

Mailing address (☐ check if same as source address): 100 Renaissance Center

City	State	ZIP Code	County	Country
Detroit	MI	48243	Wayne	USA

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

SRN: N6950	Section Number (if applicable):

PART A: GENERAL INFORMATION (continued)

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

CONTACT INFORMATION

Contact 1 Name	Title			
Patrick Doyle	Environmental Engineer			
Company Name & Mailing address (☐ check if same as source address)				
8175 Millett Highway MC: 489-001-011				
City	State	ZIP Code	County	Country
Lansing	MI	48917	Eaton	USA
Phone number		E-mail address		
517-648-4734		patrick.1.doyle@gm.com		

Contact 2 Name (optional)	Title			
Jessica Alderton	Strategic Environmental Solutions Engineer			
Company Name & Mailing address (☐ check if same as source address)				
30400 Van Dyke Ave				
City	State	ZIP Code	County	Country
Warren	MI	48093	Macomb	USA
Phone number		E-mail address		
586-863-8490		jessica.alderton@gm.com		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name	Title			
Satya Veerapaneni	Plant Executive Director			
Company Name & Mailing address (☒ check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		
(586) 335-9374		satya.veerapaneni@gm.com		

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

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

SRN: N6950	Section Number (if applicable):

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

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

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

Compliance Statement	
This source is in compliance with **all** of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP.	☒ Yes ☐ No
This source will meet in a timely manner applicable requirements that become effective during the permit term.	☒ Yes ☐ No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

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

Satya Veerapaneni, Executive Plant Director

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

Signature of Responsible Official — **Date** 10/4/24

SRN: N6950	Section Number (if applicable):

PART C: SOURCE REQUIREMENT INFORMATION

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

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

SRN: N6950	Section Number (if applicable):

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

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

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

If No, go to Part E.

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

Emission Unit ID	**Emission Unit Description**	**Rule 212(4) Citation** [e.g. Rule 212(4)(c)]	**Rule 201 Exemption Rule Citation** [e.g. Rule 282(2)(b)(i)]
EU-CBBoiler01-05	Five - 8 MMBTU/hr Hot Water Heaters subject to Boiler MACT.	Rule 212(4)(c)	Rule 282(2)(b)(i)
EU-Portable Torches	Non-production portable torches used for maintenance and repair.	Rule 212(4)(e)	Rule 285(2)(j)(i)
EU-MiscCylinders	Misc. storage of small propane, oxygen, argon, nitrogen and acetylene cylinders	Rule 212(4)(d)	Rule 284(2)(j)

Comments:

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

SRN: N6950	Section Number (if applicable):

PART E: EXISTING ROP INFORMATION

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

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

Comments:
The facility decommissioned EU-BOILER1, EU-BOILER2 and EU-BOILER3. The site is also requesting the removal of Section 2 because the boilers are no longer operational and DTE Energy no longer owns and operates the Central Utilities Complex onsite.

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

SRN: N6950	Section Number (if applicable):

PART F: PERMIT TO INSTALL (PTI) INFORMATION

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

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

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (*Include Process Equipment, Control Devices and Monitoring Devices*)	Date Emission Unit was Installed/ Modified/ Reconstructed

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

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

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

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

Comments:

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

SRN: N6950	Section Number (if applicable):

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

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

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

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

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

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

Comments:

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

SRN: N6950	Section Number (if applicable):

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

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

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

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

SRN: N6950	Section Number (if applicable):

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

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

Removal of FG-BOILERS1-3

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

Removal of FG-BOILERS1-3

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

Removal of FG-BOILERS1-3 and add FG-BOILERMACT for new hot water heaters.

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

Update EU-SEALERS & ADHESIVES RTO operating temperature to align with most recent test temperature.

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

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

Removal of FG-BOILERS1-3 and add FG-BOILERMACT for new hot water heaters.

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

Removal of FG-BOILERS1-3 and add FG-BOILERMACT for new hot water heaters.

Remove FG-SI RICE MACT and FG-CI RICE MACT reporting requirement that is not applicable to emergency engines.

SRN: N6950	Section Number (if applicable):

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

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Removal of FG-BOILERS1-3

H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. ☒ Yes ☐ No

Removal of FG-BOILERS1-3

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below. ☐ Yes ☒ No

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

EGLE

RENEWABLE OPERATING PERMIT APPLICATION

AI-001: ADDITIONAL INFORMATION

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

	SRN:	Section Number (if applicable):
1. Additional Information ID **AI-**		

Additional Information

2. Is This Information Confidential? ☐ Yes ☐ No

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

SRN: N6950	Section Number (if applicable): 1

1. Additional Information ID
AI- Part C4/C5

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Part C Section C4 and C5 - Potential to Emit:

The site decommissioned three large boilers in the CUC (previously part of Section 2 of the ROP) and installed five exempt hot water heaters (EU-CBBoilers1-5). Those are the only changes effecting the sitewide PTE since the last ROP renewal application.

The removal of Boilers 1-3 decreased the PTE by the following:

CO: - 20.6 tpy
NOx: - 12.3 tpy
SO2: - 0.1 tpy
VOC: - 1.4 tpy
PM10 / PM2.5: - 1.9 tpy

The addition of the new hot water heaters increased the PTE by the following:

CO: + 14.4 tpy
NOx: + 17.2 tpy
SO2: - 0.1 tpy
VOC: - 0.9 tpy
PM10 / PM2.5: - 1.3 tpy

A net difference of:

CO: - 6.2 tpy
NOx: + 4.9 tpy
SO2: no change
VOC: - 0.5 tpy
PM10 / PM2.5: - 0.6 tpy

Based on the changes above for criteria pollutants, the potential to emit for hazardous air pollutants (HAPs) remains more than the major source threshold of 10 tons per year for a single HAP and 25 tons per year for aggregate HAPs.

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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SRN: N6950	Section Number (if applicable): 1

1. Additional Information ID
AI- Part C8/C9

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Part C8 – CAM Plan Applicability:

Emission unit EU-Electrocoat and flexible group FG-Topcoat are both subject to CAM Plan requirements for VOC emissions. The latest versions of the CAM Plans are included with this AI form. They are not subject to CAM for particulate emissions per §64.2(a)(1) because the emission units do not have particulate emission limits.

Emission unit EU-Sealers and Adhesives has a RTO for particulate control however it is not subject to CAM because the pre-control particulate emissions are 49 tpy. The facility does not use the RTO to meet VOC emission limits.

Part C9 – Other Plans:

The facility is required to maintain an Operations and Maintenance Plan for emission unit EU-Sealers and Adhesives. The facility is also required to maintain a Work Practice Plan per flexible group FG-MACT.

The current version of each Plan is included with this AI form.

RENEWABLE OPERATING PERMIT APPLICATION
AI-001: ADDITIONAL INFORMATION

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

SRN: N6950	Section Number (if applicable): 1

1. Additional Information ID
AI- Part H

Additional Information

2. Is This Information Confidential? ☐ Yes ☒ No

Part H Summary of Changes:

The facility is adding 5 exempt hot water heaters which are subject to 40 CFR Part 63 Subpart DDDDD (Boiler MACT). FG-BOILERMACT was added to the Section 1 ROP Mark-up document.

The site is requesting the removal of Section 2 including FG-BOILERS1-3 and FG-BOILERMACT. This equipment was decommissioned. The Central Utilities Complex is no longer owned and operated by DTE Energy.

The site is requesting that non-applicable reporting requirements are removed from flexible groups FG-CI RICE MACT and FG-SI RICE MACT as noted in the mark-up.

The site transitioned the power steering fluid tank to a second automatic transmission fluid.

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

EFFECTIVE DATE: June 4, 2020
REVISION DATE: December 14, 2020SUED TO

General Motors LLC Lansing Delta Township

State Registration Number (SRN): N6950

LOCATED AT

8175 Millett Highway, Lansing, Eaton County, Michigan 48917

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N6950-2020a

Expiration Date: June 4, 2025

Administratively Complete ROP Renewal Application Due Between
December 4, 2023 and December 4, 2024

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N6950-2020a

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

Michigan Department of Environment, Great Lakes, and Energy

Brad Myott, Lansing District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

SECTION 1 – GENERAL MOTORS LLC
AUTOMOBILE MANUFACTURING FACILITY

A. GENERAL CONDITIONS

Permit Enforceability

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

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

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

General Provisions

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

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

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

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

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

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

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

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

Equipment & Design

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

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

Emission Limits

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

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

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

Testing/Sampling

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

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

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

Monitoring/Recordkeeping

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

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

Certification & Reporting

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

19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**

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

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

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

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

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

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

Permit Shield

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

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

27. Nothing in this ROP shall alter or affect any of the following:
    a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
    b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
    c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

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

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

Revisions

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

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

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

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

Reopenings

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

Section 1 - Automobile Manufacturing Facility

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

Stratospheric Ozone Protection

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

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

Risk Management Plan

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

39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
    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))**

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Permit to Install (PTI)

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

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

45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.[2] **(R 336.1219)**

46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.[2] **(R 336.1201(4))**

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

B. SOURCE-WIDE CONDITIONS

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

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-ELECTROCOAT	An electrocoat dip tank followed by an electrocoat curing oven. VOC emissions from both are controlled by an ELPO Thermal Oxidizer. After electrocoat and prior to the primer surfacer system, manual wet sanding of the vehicle may be performed to correct minor imperfections in the prime coat. The electrocoat sand operation is located in the paint shop and emissions from this operation are sent through a filter and vented back into the plant.	12-31-2005	FG-AUTOPLANT FG-AUTOMACT
EU-GUIDECOAT	A powder guidecoat (primer surfacer) spray booth followed by a guidecoat curing oven. The spray booth will be equipped with electrostatic applicators or with equivalent technology with comparable or better transfer efficiency. The spray booth is equipped with a filter system to catch powder overspray and to recirculate air through the system.	07-01-2005 02-2011	FG-AUTOPLANT FG-AUTOMACT

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-TOPCOAT1	A topcoat spray booth followed by a topcoat oven. There is a heated flash-off area located between the basecoat portion of the booth and the clearcoat portion of the booth. Basecoat will be applied manually or robotically using air atomized guns on cut-in areas. Basecoat is then applied to the body using robots equipped with electrostatic applicators. The first and second coats of exterior clearcoat are applied with electrostatic applicators. The clearcoat observation zone maybe used for backup/manual spraying if required using air atomized applicators. Each section of the topcoat booth is equipped with a waterwash system to control particulate emissions from paint overspray. The VOC emissions from the heated flash-off area and the oven are controlled by Topcoat Thermal Oxidizer. This topcoat thermal oxidizer in series with the carbon adsorption unit also controls the VOC emissions from the automatic clearcoat sections of the topcoat booths.	07-01-2005 02-2011 04-26-2014	FG-AUTOPLANT FG-TOPCOAT FG-AUTOMACT
EU-TOPCOAT2	EU-TOPCOAT2 is identical in description as EU-TOPCOAT1.	07-01-2005 02-2011 04-26-2014	FG-AUTOPLANT FG-TOPCOAT FG-AUTOMACT
EU-SEALERS & ADHESIVES	Various sealers, adhesives, and fillers are applied in the body shop, the paint shop, and the general assembly areas. None of these operations are directly vented to the outside atmosphere. VOC emissions from the paint shop sealers will be vented through the guidecoat curing oven. Particulate emissions are controlled by the guidecoat curing oven RTO.	12-31-2005 05-09-2014 02-16-2018	FG-AUTOPLANT FG-AUTOMACT
EU-GLASS INSTALLATION	In General Assembly, primer and adhesive materials are applied to the windshield and back glass openings and/or to the glass itself. The glass is then mounted to the vehicle. None of these operations are vented to the outside atmosphere.	12-31-2005	FG-AUTOPLANT FG-AUTOMACT
EU-VEHICLE FUEL FILL	Each new vehicle will be filled with various fluids such as power steering fluid, antifreeze, transmission fluid, engine oil, windshield washer fluid, refrigerant, and gasoline. All vehicles being filled with gasoline shall be equipped with an Onboard Re-Fueling Vapor Recovery System (ORVR) to control VOC emissions.	12-31-2005 09-23-2009	FG-AUTOPLANT

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-NATURAL GAS	Natural gas burning will take place in the ovens, the paint booth air supply houses, the two thermal oxidizers, and miscellaneous support equipment installed under this permit. Note: a separate permit will cover installation of boilers for heating and cooling requirements.	01-01-2005	FG-AUTOPLANT
EU-PURGE	This operation is the purging of the paint lines and spray guns within the paint spray booths. The clearcoat automatic paint robots are to purge into cups to collect the purge materials. When purging takes place within the controlled clearcoat sections of the topcoat booths, the add-on VOC control equipment shall be in place and operating properly. These activities will involve the use of VOC containing materials and acetone.	07-01-2005	FG-AUTOPLANT FG-SOLVENTS FG-AUTOMACT
EU-OTHER SOLVENTS	These activities consist of booth cleaning, miscellaneous cleaning activities, body wipe, and materials added to the water wash particulate control systems. These activities will involve the use of VOC containing materials and acetone.	07-01-2005	FG-AUTOPLANT FG-SOLVENTS FG-AUTOMACT
EU-SPOT REPAIR 1-4	Four dry filter spot repair spray booths. The booths are equipped with air atomized applicators or equivalent technology with comparable or better transfer efficiency.	07-01-2005	FG-AUTOPLANT FG-REPAIR FG-AUTOMACT
EU-FINAL REPAIR 1	A dry filter final repair spray booth. The booth is equipped with air atomized applicators or equivalent technology with comparable or better transfer efficiency.	07-01-2005	FG-AUTOPLANT FG-REPAIR FG-AUTOMACT
EU-GAS TANK 1	An above ground gasoline storage tank equipped with submerged fill pipes and conservation vents. The gasoline storage tank is filled using a vapor balance system.	04-01-2006	FG-AUTOPLANT FG-TANKS
EU-GAS TANK 2	An above ground gasoline storage tank equipped with submerged fill pipes and conservation vents. The gasoline storage tank is filled using a vapor balance system.	04-01-2006	FG-AUTOPLANT FG-TANKS
EU-AF TANK 1	An above ground antifreeze storage tank equipped with submerged fill pipes and conservation vents.	04-01-2006	FG-AUTOPLANT FG-TANKS
EU-AF TANK 2	An above ground antifreeze storage tank equipped with submerged fill pipes and conservation vents.	04-01-2006	FG-AUTOPLANT FG-TANKS
EU-PR TANK 1	An above ground purge recovery storage tank equipped with submerged fill pipes and conservation vents.	04-01-2006	FG-AUTOPLANT FG-TANKS
EU-METH TANK 2	An above ground methanol (windshield washer fluid) storage tank equipped with submerged fill pipes and conservation vents.	12-31-2008	FG-AUTOPLANT FG-TANKS FG-OLD

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-TF TANK	An above ground transmission fluid storage tank equipped with submerged fill pipes and conservation vents.	04-01-2006	FG-AUTOPLANT FG-TANKS
EU-BF TANK	An above ground brake fluid storage tank equipped with submerged fill pipes and conservation vents.	04-01-2006	FG-AUTOPLANT FG-TANKS
EU-PSF TANK	An above ground power steering fluid storage tank equipped with submerged fill pipes and conservation vents.	04-01-2006	FG-AUTOPLANT FG-TANKS
EU-PHOSPHATE	The phosphate system consists of two parts – pre-phosphate washers, which essentially act as a car wash, which is meant to remove oil and grease from the bodies and the main phosphate tanks, which adds micro-crystals to the sheet metal surface. None of the materials used in the phosphate system contain any VOCs or volatile HAPs.	12-31-2005	FG-AUTOPLANT FG-AUTOMACT
EU-SOUND DAMP	An acoustical damper product that will be applied using robotic spray equipment. There are no VOC emissions, PM emissions nor any stacks associated with this process.	12-31-2005	FG-AUTOPLANT FG-AUTOMACT
EU-BODY SHOP	In the body shop, sheet metal components are welded together to form the vehicles. Other miscellaneous resistance spot welding, MIG welding and metal grinding operations are performed throughout the body shop. None of the body shop operations are directly vented to the outside atmosphere.	12-31-2005	FG-AUTOPLANT
EU-EMERGENCY FIRE PUMP 1	An existing 368 HP Emergency CI engine subject to RICE MACT Subpart ZZZZ.	01-01 2001	FG-CI RICE MACT
EU-EMERGENCY FIRE PUMP 2	An existing 420 HP Emergency CI engine subject to RICE MACT Subpart ZZZZ.	10-01 2005	FG-CI RICE MACT
EU-EMERGENCY SI ENGINE 1	An existing 383 HP Emergency SI engine subject to RICE MACT Subpart ZZZZ.	12-01 2005	FG-SI RICE MACT

EU-ELECTROCOAT
EMISSION UNIT CONDITIONS

DESCRIPTION

An electrocoat dip tank followed by an electrocoat curing oven. The VOC emissions from both are controlled by an ELPO Thermal Oxidizer. After electrocoat and prior to the primer surfacer system, manual wet sanding of the vehicle may be performed to correct minor imperfections in the prime coat. The electrocoat sand operation is located in the paint shop and emissions from this operation are sent through a filter and vented back into the plant.

Flexible Group ID: FG-AUTOPLANT, FG-AUTOMACT

POLLUTION CONTROL EQUIPMENT

ELPO Thermal Oxidizer (40)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	0.04 lb/GACS[2]	Calendar month average	EU-ELECTROCOAT	SC VI.5	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(j)**
2. VOCs and acetone combined	67.9 lb/day[2]	Per Calendar Day	EU-ELECTROCOAT	SC VI.5	**R 336.1205 R 336.1224 R 336.1225**
3. VOCs and acetone combined	8.8 Tons[2]	12-month rolling timer period as determined at the end of each calendar month	EU-ELECTROCOAT	SC VI.5	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(j)**
4. VOCs	1.41 lb/GACS[a]	Monthly	EU-ELECTROCOAT	SC VI.5	**40 CFR 60.392**

Note: The allowed mass VOC emission limits include acetone and the combined VOC and acetone emissions shall not exceed the VOC emission limits.

[a]When the turnover ratio (R_t) is greater than or equal to 0.040 and less than 0.160, the VOC emission limit is $1.41*350^{(0.160-Rt)}$Lb/GACS. When the turnover ratio is less than 0.040, there is no emission limit.

II. MATERIAL LIMIT(S)

1. None of the coatings used in EU-ELECTROCOAT shall contain any lead, or lead compounds.[1] **(R 336.1225)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. All waste coatings and VOC containing materials shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

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

3. The applicant shall operate the electrocoat dip tank such that adequate positive flow of air into the electrocoat dip tank occurs whenever EU-ELECTROCOAT is in operation. Adequate positive flow of air into the dip tank shall be demonstrated according to a method acceptable to the District Supervisor. In addition, the applicant shall keep all access doors and windows on the electrocoat dip tank closed whenever the electrocoat process is in operation.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 52.21(j))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The applicant shall not operate the electrocoat dip tank and/or the electrocoat curing oven portions of EU-ELECTROCOAT unless the ELPO Thermal Oxidizer is installed and operated properly. Proper operation of the thermal oxidizer includes a minimum VOC destruction efficiency of 95% (by weight) and maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, an average temperature of 1400°F based upon a three-hour rolling average may be used.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 52.21(j), 40 CFR 64.6(c)(1)(i & ii))**

V. TESTING/SAMPLING

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

1. The VOC content of any coating or material as applied and as received shall be determined using federal Reference Test Method 24 or an alternative method approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content of any coating or material shall be verified by testing using federal Reference Test Method 24.[2] **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, 40CFR 52.21(j))**

2. At least once every five years, unless the permittee maintains a yearly demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify the EU-ELECTROCOAT dip tank and oven control device destruction efficiency, by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R 336.1702(a), R 336.2001, 40 CFR 52.21(j))**

See Appendix 5-1

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 end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.1702, 40 CFR 52.21(j))**

2. The applicant shall monitor and record the temperature in the ELPO Thermal Oxidizer on a continuous (measurements made at equally spaced intervals, not to exceed 15 minutes per interval) basis in a manner and with instrumentation acceptable to the AQD. All temperature data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j), 40 CFR 60.390, 40 CFR 64.6(c)(1)(i & ii))**

3. The applicant shall maintain a current listing from the manufacturer of the chemical composition of each coating and material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

4. For each control device in operation during production (coating vehicles, etc.), the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line(s) that was open and the length of time the bypass was open shall be kept on file.[2] **(R 336.1702, R 336.1910, 40 CFR 64.3(a)(2))**

5. The applicant shall keep production, usage, VOCs, solids content, and emission calculation records on a monthly basis for each coating or material used in EU-ELECTROCOAT. The records shall be kept in a format acceptable to the AQD District Supervisor and as a minimum, shall indicate the following:
   a. The number of production days per month.
   b. The monthly usage rate of each material or coating (in gallons - with water).
   c. For each coating or material: Monthly records showing:
      i. The pounds of VOCs per gallon as applied (with water). Note, the VOC content should include acetone.
      ii. The solids volume fraction.
   d. The calculated average monthly VOC emission rate in pounds per gallon of applied coating solids.
   e. Calculated VOC emission rates in pounds per day (based upon a monthly proration) and tons per year based upon a 12-month rolling time period. Note, the VOC emission rates calculated should include acetone.
   f. The calculated turnover ratio referenced in 40 CFR 60.393(c)(1)(i)(E) if an emission limit other than those required under SC I.4 footnote “a” are used.

   All such records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, R 336.1225, R 336.1702(a), 40 CFR 52.21(j), R336.1213(3))**

6. The permittee shall keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for respective control device used to demonstrate compliance with the applicable VOC emission limits:[2] **(R 336.1910, R 336.1911, 40 CFR 64.6(c)(1)(i & ii), 40 CFR 64.7(e))**
   a. Validation of thermocouple accuracy or recalibration of each temperature thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
   b. Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months. *
   c. Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months. *

   * The requirement to address these items is satisfied if a performance test (i.e., stack test) has been performed on the control device within the prior 18-month period.

7. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR 64.7(d))**

8. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all

times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 64.7(c))**

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.[a] **(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.[a] **(R 336.1213(4)(c))**

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

[a] In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined reporting requirement established by R 336.1213(3)(c)(i) and R 336.1213(4)(c) shall be considered compliance with the reporting in/established by 40 CFR 60.395(b). If there is a deviation from an emission limit listed in 40 CFR 60.392, the site must submit a quarterly report as required by 40 CFR 60.395(b).

See Appendix 8-1

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. ELPO Thermal Oxidizer (40)	48[2]	127[2]	**R 336.1225** **40 CFR 52.21(c) & (d)**

IX. OTHER REQUIREMENT(S)

1. For the purposes of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(40 CFR 64.6(c)(2))**
   a. A temperature excursion is defined as a failure to meet the specified temperature requirements in SC IV.1.
   b. A monitoring excursion is defined as a failure to properly monitor as required by SC VI.2.
   c. A monitoring excursion is defined as a failure to properly implement and/or maintain requirements in SC VI.4 and VI.6.a.

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

3. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or

the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

4. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and IIII, as they apply to EU-ELECTROCOAT.[2] **(40 CFR Part 63, Subparts A and IIII)**

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

EU-GUIDECOAT
EMISSION UNIT CONDITIONS

DESCRIPTION

A powder guidecoat (primer surfacer) spray booth followed by a guidecoat curing oven. The spray booth will be equipped with electrostatic applicators or with equivalent technology with comparable or better transfer efficiency. The spray booth is equipped with a filter system to catch powder overspray and to recirculate air through the system.

Flexible Group ID: FG-AUTOPLANT, FG-AUTOMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	11.6 Lbs/GAC	Monthly	EU-GUIDECOAT	SC VI.1	**40 CFR Part 60.392**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

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 applicant shall keep production, usage, VOCs, solids content, and emission calculation records on a monthly basis for each coating or material used in EU-GUIDECOAT. The records shall be kept in a format acceptable to the AQD District Supervisor and as a minimum, shall indicate the following:
   a. The number of production days per month.
   b. The monthly usage rate of each material or coating (in gallons - with water).
   c. For each coating or material: Monthly records showing:
      i. The pounds of VOCs per gallon as applied (with water).
      ii. The solids volume fraction.
   d. The calculated average monthly VOC emission rate in pounds per gallon of applied coating solids.

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.[a] **(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.[a] **(R 336.1213(4)(c))**

[a] In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined reporting requirement established by R 336.1213(3)(c)(i) and R 336.1213(4)(c) shall be considered compliance with the reporting in/established by 40 CFR 60.395(b). If there is a deviation from an emission limit listed in 40 CFR 60.392, the site must submit a quarterly report as required by 40 CFR 60.395(b).

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-RTO (Guidecoat Oven RTO)	43.8[2]	127[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) and (d)**

IX. OTHER REQUIREMENT(S)

NA

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

EU-SEALERS & ADHESIVES
EMISSION UNIT CONDITIONS

DESCRIPTION

Various sealers, adhesives, and fillers are applied in the body shop, the paint shop, and the general assembly areas. VOC emissions from the paint shop sealers will be vented through the guidecoat curing oven. Particulate emissions are controlled by the guidecoat curing oven RTO.

Flexible Group ID: FG-AUTOPLANT, FG-AUTOMACT

POLLUTION CONTROL EQUIPMENT

Regenerative thermal oxidizer (RTO) for particulate control.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs and acetone combined	97.0 tpy[2]	12-month rolling time period as determined at the end of each calendar month	EU-SEALERS & ADHESIVES	SC VI.3	**R 336.1224, R 336.1702(a), R 336.2810**
2. VOCs and acetone combined	863.1 lb/day[2]	Calendar day	EU-SEALERS & ADHESIVES	SC VI.3	**R 336.1205(1)(a) and (1)(b)**
3. VOCs	0.3 lb/gal (minus water)[a] as applied[2]	Monthly volume-weighted average	EU-SEALERS & ADHESIVES	SC V.1, SC VI.3	**R 336.1702(a) R 336.2810**
4. PM	0.011 lb per 1000 lb of exhaust gas[2]	Hourly	EU-SEALERS & ADHESIVES	SC V.2	**R 336.1205(1)(a) and (1)(b), R 336.1331(1)(c)**
5. PM10	1.1 pph[2]	Hourly	EU-SEALERS & ADHESIVES	SC V.2	**R 336.1205(1)(a) and (1)(b), 40 CFR 52.21(c) and (d)**
6. PM2.5	1.1 pph[2]	Hourly	EU-SEALERS & ADHESIVES	SC V.2	**R 336.1205(1)(a) and (1)(b), 40 CFR 52.21(c)and (d)**

[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))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials which contain VOC and acetone 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 336.1702(a), R 336.2810)**

2. The permittee shall maintain and implement an Operation and Maintenance Plan (O & M Plan) for EU-SEALERS & ADHESIVES. The O & M Plan shall contain the minimum requirements as outlined in Appendix 4-1. The O & M Plan shall be updated as necessary to reflect changes in equipment and monitoring, to implement corrective

actions and to address malfunctions. Changes in the O & M Plan as outlined in Appendix 4-1 shall be submitted to the AQD District Supervisor for review and approval. All records and activities associated with the O & M Plan shall be made available to the Department upon request.[2] **(R 336.1224, R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21 (c) and (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate guidecoat curing oven portion of EU-SEALERS & ADHESIVES unless the particulate control device, an RTO, is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of RTO includes maintaining a minimum temperature of 1396°F or the minimum temperature from the most recent acceptable stack test (required temperature), and a minimum retention time of 0.5 seconds. If the measured operating temperature of the RTO falls below the required temperature during operation of guidecoat curing oven, the permittee may demonstrate compliance based upon a three-hour average temperature by calculating the average operating temperature for each three hour period which includes one or more temperature readings below the required temperature.[2] **(R 336.1205, R 336.1224, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21 (c) and (d))**

V. TESTING/SAMPLING

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

1. The VOC content of any material as applied and as received shall be determined using federal Reference Test Method 24 or an alternative method approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content of any material shall be verified by testing using federal Reference Test Method 24.[2] **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2810)**

2. Once every five years, unless the permittee has maintained an annual demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify PM2.5, PM10, and PM emission rates from EU-SEALERS & ADHESIVES, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in Reference Test Method Table below.

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.[2] **(R 336.1331, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21 (c) and (d))**

See Appendix 5-1

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 end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.1702, R 336.2810)**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each sealer and adhesive including the weight percent of each component. The data may consist of Safety Data Sheets,

manufacturer's formulation data, or both. The data shall be made available to the Department upon request.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.2810)**

3. The permittee shall keep the following information for EU-SEALERS & ADHESIVES:
   a. Gallons (with water) of each material used per calendar month.
   b. VOC content (minus water and with water) of each material as applied.
   c. VOC emission calculations determining the average daily volume-weighted VOC content of the materials in pounds per gallon (minus water) as applied on a monthly basis.
   d. VOC and acetone mass emission calculations determining the daily (based upon a monthly proration) and monthly emission rate in pounds and tons per calendar month.
   e. VOC and acetone 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. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1205, R 336.1224, R 336.1299, R 336.1702, R 336.2810)**

4. The permittee shall continuously monitor and record, in a satisfactory manner, the parameters that demonstrate proper operation of the guidecoat RTO. Monitoring shall consist of measurements of temperature, or other methods acceptable to the AQD District Supervisor. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request.[2] **(R 336.1331, 40 CFR 52.21 (c) and (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 8-1

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-RTO (Guidecoat Oven RTO)	43.8[2]	127[2]	**R 336.1225, R 336.2804, 40 CFR 52.21 (c) and (d)**

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and IIII: Surface Coating of Automobiles and Light-Duty Trucks, as they apply to EU-SEALERS & ADHESIVES.[2] **(40 CFR Part 63, Subparts A and IIII)**

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

EU-GLASS INSTALLATION
EMISSION UNIT CONDITIONS

DESCRIPTION

In General Assembly, primer and adhesive materials are applied to the windshield and back glass openings and/or to the glass itself. The glass is then mounted to the vehicle. None of these operations are vented to the outside atmosphere.

Flexible Group ID: FG-AUTOPLANT, FG-AUTOMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	0.4 Lb/Gal (minus water) as applied[2]	Monthly Weighted Average	EU-GLASS INSTALLATION	SC V.1, VI.3	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(j)**
2. VOCs and acetone combined	174.8 lb/day[2]	Calendar Day	EU-GLASS INSTALLATION	SC VI.3	**R 336.1205 R 336.1224 R 336.1225**
3. VOCs and acetone combined	22.6 Tons[2]	12-month rolling time period as determined at the end of each calendar month	EU-GLASS INSTALLATION	SC VI.3	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(j)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. All waste coatings and VOC containing materials shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content of material as applied and as received shall be determined using federal Reference Test Method 24 or an alternative method approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the District Supervisor, the VOC content of any material shall be verified by testing using federal Reference Test Method 24.[2] **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(j))**

See Appendix 5-1

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 end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.1702, 40 CFR 52.21(j))**

2. The applicant shall maintain a current listing from the manufacturer of the chemical composition of each coating and material including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

3. The applicant shall keep usage and VOC emissions calculations records on a monthly basis for each material (as received or as applied if applicable) used in EU-GLASS INSTALLATION. The records shall be kept in a format acceptable to the AQD District Supervisor and as a minimum shall indicate the following:
   a. A description of the material and its VOC content in pounds per gallon (minus water and with water, where applicable). Note, the VOC contents should include acetone.
   b. The monthly usage rate of each material.
   c. The amount of material reclaimed where applicable.
   d. VOC emission calculations determining the total VOC mass emissions in pounds per calendar day (based upon a monthly proration) and tons per year based on a 12-month rolling time period. Note, the VOC emission rates calculated should include acetone.
   e. Monthly calculations of the average daily pounds of VOC/gallon.

   All such records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

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 8-1

VIII. STACK/VENT RESTRICTION(S)

1. None of the operations within EU-GLASS INSTALLATION shall be directly vented to the outside atmosphere.[2] **(R 336.1225, 40 CFR 52.21(c) and (d))**

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and IIII, as they apply to EU-GLASS INSTALLATION.[2] **(40 CFR Part 63, Subparts A and IIII)**

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

EU-VEHICLE FUEL FILL
EMISSION UNIT CONDITIONS

DESCRIPTION

Each new vehicle will be filled with various fluids such as antifreeze, transmission fluid, engine oil, windshield washer fluid, refrigerant, and gasoline. All vehicles being filled with gasoline shall be equipped with an Onboard Re-Fueling Vapor Recovery System (ORVR) to control VOC emissions.

Flexible Group ID: FG-AUTOPLANT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	0.5 tons[2]	Per 12-Month Rolling Time Period	EU-VEHICLE FUEL FILL	SC VI.1	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) R 336.2810 40 CFR 52.21**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The applicant shall not add fuel to any vehicle without an Onboard Re-fueling Vapor Recovery system unless the VOC emissions from the fuel filling process are controlled by a VOC control device, which achieves a minimum of 95% (by weight) destruction efficiency.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, R 336.2810, 40 CFR 52.21)**

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 applicant shall keep monthly records, acceptable to the AQD District Supervisor, of the following information for EU-VEHICLE FUEL FILL:
   a. A description of each fuel used.
   b. The monthly usage rate of each fuel.

c. VOC emission calculations determining the total VOC mass emissions in tons per year based upon a 12-month rolling time period.

All such records are for the purposes of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.2810, 40 CFR 52.21)**

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 8-1

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-FF1	32[2]	45[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) and (d)**
2. SV-FF2	32[2]	45[2]	**R 336.1225 R 336.2803 R 336.2804 40 CFR 52.21 (c) and (d)**

IX. OTHER REQUIREMENT(S)

NA

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

EU-NATURAL GAS
EMISSION UNIT CONDITIONS

DESCRIPTION

Natural gas burning will take place in the ovens, the paint booth air supply houses, the three thermal oxidizers, and miscellaneous support equipment installed under this permit.

Flexible Group ID: FG-AUTOPLANT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	0.0055 Lbs. Per Million BTUs of Heat Input[2]	Instantaneous	EU-NATURAL GAS	SC VI.1	**R 336.1205 R 336.1702(a) 40 CFR Part 52.21**
2. VOC	2.7 Tons[2]	Per 12-Month Rolling Time Period	EU-NATURAL GAS	SC VI.1	**R 336.1205 R 336.1702(a) 40 CFR Part 52.21**
3. NOx	0.08 Lbs. Per Million BTUs of Heat Input[2]	Weighted average	EU-NATURAL GAS	SC III.1	**R 336.1205 40 CFR 52.21 (c) and (d)**
4. NOx	39.1Tons[2]	Per 12-Month Rolling Time Period	EU-NATURAL GAS	SC VI.1	**R 336.1205 40 CFR 52.21 (c) and (d)**

II. MATERIAL LIMIT(S)

1. The total natural gas usage for EU-NATURAL GAS combined shall not exceed a maximum 991 million cubic feet per year. Compliance with the cubic feet per year limit is based on a rolling time period of 12 consecutive calendar months as determined at the end of each month. All data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205 and 40 CFR 52.21(c) and (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. All of the natural gas burners installed and operated under this permit shall meet 0.08 Lbs. of NOx Per Million BTUs of Heat Input or less based upon a weighted average of all burners. A copy of the vendor guarantee's or other emission data used to determine the weighted average in the permit application for all natural gas fired process burners shall be kept on file and made available to the Department upon request.[2] **(R 336.1205, 40 CFR 52.21(c) and (d))**

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 keep monthly natural gas usage records, acceptable to the AQD District Supervisor, indicating the amount of natural gas used, in cubic feet, on a calendar month basis and a 12-month rolling time period basis. The records must indicate the total amount of natural gas used by EU-NATURAL GAS. Based upon these records, the applicant shall calculate the NOx emissions from EU-NATURAL GAS. These calculations shall be on a calendar month basis and a 12-month rolling time period basis. In the absence of any actual emissions test data, and unless an alternative emission factor is approved in writing by the District Supervisor AQD, the applicant shall use the weighted average emission factor of all natural gas burners (<= 80 pounds of NOx emitted per million cubic feet of gas burned). Also, based upon the natural gas usage records, the applicant shall calculate the VOC emissions from EU-NATURAL GAS. These calculations shall be on a calendar month basis and a 12-month rolling time period basis. The permittee shall use an emission factor of 5.5 pounds of VOCs emitted per million cubic feet of gas burned. All such records and calculations are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, 40 CFR 52.21(c) and (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 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

EU-PHOSPHATE
EMISSION UNIT CONDITIONS

DESCRIPTION

The phosphate system consists of two parts – pre-phosphate washers, which essentially act as a car wash, which is meant to remove oil and grease from the bodies and the main phosphate tanks, which adds micro-crystals to the sheet metal surface. None of the materials used in the phosphate system contain any VOCs or volatile HAPs.

Flexible Group ID: FG-AUTOPLANT, FG-AUTOMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The materials used in EU-PHOSPHATE shall not contain any VOCs, and acetone, as defined by the supplier's SDS sheets.[2] **(R 336.1205, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

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 applicant shall maintain a current listing from the manufacturer of the chemical composition of each material used in EU-PHOSPHATE, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

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 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

EU-SOUND DAMP
EMISSION UNIT CONDITIONS

DESCRIPTION

An acoustical damper product that will be applied using robotic spray equipment. There are no VOC emissions, PM emissions nor any stacks associated with this process.

Flexible Group ID: FG-AUTOPLANT, FG-AUTOMACT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The materials used in EU-SOUND DAMP shall not contain any VOC's as defined by the suppliers SDS sheets.[2] **(R 336.1205, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The applicant shall maintain a current listing from the manufacturer of the chemical composition of the materials used in EU-SOUND DAMP including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

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 8-1

VIII. STACK/VENT RESTRICTION(S)

1. None of the operations within EU-SOUND DAMP shall be directly vented to the outside atmosphere.[2] **(R 336.1225, 40 CFR 52.21(c) and (d))**

IX. OTHER REQUIREMENT(S)

NA

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

EU-BODY SHOP
EMISSION UNIT CONDITIONS

DESCRIPTION

In the body shop, sheet metal components are welded together to form the vehicles. Other miscellaneous resistance spot welding, MIG welding and metal grinding operations are performed throughout the body shop. None of the body shop operations are directly vented to the outside atmosphere.

Flexible Group ID: FG-AUTOPLANT

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. Each of the materials used in EU-BODY SHOP and not covered in this permit under another emission unit and/or flexible group shall not contain any volatile organic compounds as defined by the suppliers Safety Data Sheets (SDS).[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The applicant shall maintain a current listing from the manufacturer of the chemical composition of each material used in EU-BODY SHOP and not covered in this permit under another emission unit and/or flexible group. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

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 8-1

VIII. STACK/VENT RESTRICTION(S)

1. None of the equipment within EU-BODY SHOP shall be directly vented to the outside atmosphere. All emissions from these operations shall be vented back into the in-plant environment.[2] **(R 336.1225, 40 CFR 52.21 (c) and (d))**

IX. OTHER REQUIREMENT(S)

NA

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

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-TOPCOAT	Two identical topcoat processes. Each is used to apply both basecoat and clearcoat to vehicle bodies.	EU-TOPCOAT1 EU-TOPCOAT2
FG-SOLVENTS	Solvents used for cleanup and purge of facility paint systems. A solvent recovery system is in place to recover solvents used in the purging of automatic spray guns. Also, included is a manual body wipe.	EU-PURGE EU-OTHER SOLVENTS
FG-REPAIR	Spot and final repair operations.	EU-SPOT REPAIR 1-4 EU-FINAL REPAIR 1
FG-TANKS	Nine storage tanks.	EU-GAS TANK 1 EU-GAS TANK 2 EU-AF TANK 1 EU-AF TANK 2 EU-PR TANK 1 EU-METH TANK 2 EU-TF TANK 1 EU-BF TANK EU-TF TANK 2
FG-AUTOMACT	Each new, reconstructed, or existing affected source as defined in 40 CFR 63.3082, that is located at a facility which applies topcoat to new automobile or new light duty truck bodies or body parts for new automobiles or new light duty trucks; AND/OR in which you choose to include, pursuant to 40 CFR 63.3082(c), any coating operations which apply coatings to new other motor vehicle bodies or body parts for new other motor vehicles; parts intended for use in new automobiles, new light duty trucks or new other motor vehicles; or aftermarket repair or replacement parts for automobiles, light duty trucks or other motor vehicles; and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAPs) except as provided in 40 CFR 63.3081(c). This includes equipment covered by other permits, grandfathered equipment, and exempt equipment.	EU-ELECTROCOAT EU-GUIDECOAT EU-TOPCOAT1 EU-TOPCOAT2 EU-SEALERS & ADHESIVES EU-GLASS INSTALLATION EU-SPOT REPAIR 1-4 EU-FINAL REPAIR 1 EU SOUND DAMP EU-PURGE EU-OTHER SOLVENTS EU-PHOSPHATE

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-OLD	Organic Liquid Distribution (OLD) (non-gasoline) operations at major sources of HAP emissions. Specifically, these conditions cover existing (construction pre dates April 2, 2002) liquid storage tanks which hold more than 5,000 gallons but less than 50,000 gallons and/or new liquid storage tanks which hold more than 5,000 gallons but less than 10,000 gallons of methanol/windshield washer fill solvents that are dispensed to newly assembled vehicles.	EU-METH TANK 2
FG-AUTOPLANT	This flexible group covers conditions, which apply to all of the equipment included within this permit.	EU-ELECTROCOAT EU-GUIDECOAT EU-TOPCOAT1 EU-TOPCOAT2 EU-SEALERS & ADHESIVES EU-GLASS INSTALLATION EU-VEHICLE FUEL FILL EU-NATURAL GAS EU-PURGE EU-OTHER SOLVENTS EU-SPOT REPAIR 1-4 EU-FINAL REPAIR 1 EU-GAS TANK 1 EU-GASTANK 2 EU-AF TANK 1 EU-AF TANK 2 EU-PR TANK 1 EU-METH TANK 2 EU-TF TANK EU-BF TANK EU-PSF TANK EU-PHOSOPHATE EU-SOUND DAMP EU-BODY SHOP
FG-SI RICE MACT	An existing 383 HP Emergency SI engine subject to RICE MACT Standard, Subpart ZZZZ.	EU-EMERGENCY SI ENGINE 1
FG-CI RICE MACT	An existing 368 HP Emergency CI engine subject to RICE MACT Standard, Subpart ZZZZ. An existing 420 HP Emergency CI engine subject to RICE MACT Standard, Subpart ZZZZ.	EU-EMERGENCY FIRE PUMP 1 EU-EMERGENCY FIRE PUMP 2
FG-COLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, Rule 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	NA

FG-TOPCOAT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Two identical topcoat processes. Each is used to apply both basecoat and clearcoat to vehicle bodies.

Emission Units: EU-TOPCOAT1, EU-TOPCOAT2

POLLUTION CONTROL EQUIPMENT

Carbon adsorption unit, RTO and a water wash particulate control system

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	5.42 lb/GACS[2]	Calendar Day Averaging	FG-TOPCOAT	SC VI.8	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(j)**
2. VOCs and acetone combined	4,516 Pounds[2]	Calendar Day	FG-TOPCOAT	SC VI.8	**R 336.1205 R 336.1224 R 336.1225**
3. VOCs and acetone combined	583.6 Tons[2]	12-month rolling time period as determined at the end of each calendar month	FG-TOPCOAT	SC VI.8	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(j)**
4. VOCs	12.2 lb/GACS	Monthly	FG-TOPCOAT	SC VI.8	**40 CFR 60.392**

II. MATERIAL LIMIT(S)

1. The applicant shall not use any basecoat coating that exceeds an uncontrolled total formaldehyde content of 0.7% by weight. Further, the melamine formaldehyde resin content of these coatings shall not exceed 15.0% by weight as determined from the supplier's safety data sheets (SDS). The applicant shall not use any clearcoat coating that exceeds an uncontrolled total formaldehyde content of 2.2% by weight. Further, the melamine formaldehyde resin content of these coatings shall not exceed 20.0 % by weight as determined from the supplier's safety data sheets (SDS). The uncontrolled total formaldehyde content is defined as the total of free formaldehyde in the coating formulation and any additional formaldehyde liberated from the melamine formaldehyde resin during curing, without any reduction for add-on VOC control equipment being taken.[1] **(R 336.1225(2))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. All waste coatings and VOC containing materials shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations.[2] **(R 336.1205, R 336.1224, R 336.1702(a), 40 CFR 52.21(j))**

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

3. The applicant shall operate each automatic clearcoat section of the two topcoat booths, such that adequate positive flow of the air into the controlled zones occurs whenever the respective booth sections are in use. Adequate positive flow of air into the controlled zones shall be demonstrated according to a method acceptable to the AQD District Supervisor. This requirement does not apply during topcoat equipment validation resulting from robot maintenance during non-production periods.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 52.21(j))**

4. The applicant shall operate FG-TOPCOAT such that the average desorption gas inlet temperature in any 3-hour period does not fall below the temperature limit established for that device by the most recent acceptable performance test minus 15 degrees Fahrenheit.[2] **(R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The applicant shall not operate either of the two-basecoat heated flash and/or either of the two topcoat curing ovens of FG-TOPCOAT unless Topcoat Thermal Oxidizer is installed and operated properly. Proper operation of the thermal oxidizer includes a minimum VOC destruction efficiency of 95% (by weight) and maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, an average temperature of 1400°F based upon a three-hour rolling average may be used.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 64.6(c)(1)(i & ii), 40 CFR 52.21(j))**

2. The applicant shall not operate either of the two clearcoat booth portions of FG-TOPCOAT unless the carbon adsorption unit followed in series by Topcoat Thermal Oxidizer are both installed and operated properly. Proper operation of the thermal oxidizer includes a minimum VOC destruction efficiency of 95% (by weight) and maintaining a minimum temperature of 1400°F and a minimum retention time of 0.5 seconds. In lieu of a minimum temperature, an average temperature of 1400°F based upon a three-hour rolling average may be used. This requirement does not apply during topcoat equipment validation resulting from robot maintenance during non-production periods.[2] **(R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 64.6(c)(1)(i & ii), 40 CFR 52.21(j))**

3. The applicant shall install, maintain and operate in a satisfactory manner a carbon adsorption unit to control VOC emissions from the clearcoat spray booth portions of FG-TOPCOAT. Satisfactory operation of the carbon adsorption unit includes collecting desorption gas inlet temperature data above the temperature from the most recent acceptable performance test minus 15 degrees Fahrenheit and can be based upon a three-hour average. This requirement does not apply during topcoat equipment validation resulting from robot maintenance during non-production periods.[2] **(R 336.1702(a), R 336.1910, 40 CFR 64.6(c)(1)(i & ii), 40 CFR 52.21(j))**

V. TESTING/SAMPLING

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

1. The VOC content of any coating or material as applied and as received shall be determined using federal Reference Test Method 24 or an alternative method approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content of any coating or material shall be verified by testing using federal Reference Test Method 24.[2] **(R 336.1702(a), R 336.2001, R 336.2003, R 336.200, 40CFR 52.21(j))**

2. At least once every five years, unless the permittee maintains a yearly demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify the capture efficiency and the removal/destruction efficiency of the control equipment portions of FG-TOPCOAT, by testing at owner's expense, in accordance with Department requirements, 40 CFR Part 51, Appendix M, and the USEPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA-453/R-08-002, as amended. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(j))**

3. At least once every five years, unless the permittee maintains a yearly demonstration that the most recent acceptable test remains valid and representative, the permittee shall verify the transfer efficiency of FG-TOPCOAT, by testing at owner's expense, in accordance with Department requirements, 40 CFR Part 51, Appendix M, and the USEPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," September 2008, EPA-453/R-08-002, as amended. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission limits includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.[2] **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(j))**

See Appendix 5-1

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 end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.1702, 40 CFR 52.21(j))**

2. The applicant shall monitor and record the temperature in Topcoat Thermal Oxidizer on a continuous (measurements made at equally spaced intervals, not to exceed 15 minutes per interval) basis in a manner and with instrumentation acceptable to the AQD. All temperature data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 52.21, 40 CFR 60.390, 40 CFR 64.6(c)(1)(i & ii))**

3. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device to determine the concentrator desorption gas inlet temperature on a continuous basis, during operation of FG-TOPCOAT. Desorption gas inlet temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval.[2] **(R 336.1702(a), 40 CFR 64.6(c)(1)(i & ii))**

4. The applicant shall maintain a current listing from the manufacturer of the chemical composition of each coating and material including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

5. For each control device in operation during production (coating vehicles, etc.), the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line(s) that was open and the length of time the bypass was open shall be kept on file.[2] **(R 336.1910, R 336.1911, 40 CFR 64.3(a)(2))**

6. The permittee shall keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for respective control device used to demonstrate compliance with the applicable VOC emission limits:[2] **(R 336.1910, R 336.1911, 40 CFR 64.6(c)(1)(i & ii), 40 CFR 64.7(e))**
   a. Validation of thermocouple accuracy or recalibration of each temperature thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
   b. Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months. *
   c. Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months. *

   *The requirement to address these items is satisfied if a performance test (i.e., stack test) has been performed on the control device within the prior 18-month period.

7. The applicant shall keep monthly records of topcoat equipment validation and maintenance during non-production periods for FG-TOPCOAT. The records shall be kept in a format acceptable to the AQD District Supervisor, and as a minimum, shall indicate the following:
   a. The date of the validation.
   b. The line or lines upon which it was done.
   c. The time of the validation.
   d. The type, amount, and VOC content of each material (as sprayed) used in the validation.

   All such records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

8. The applicant shall keep production, usage, VOCs, solids content and emissions calculations records on a monthly basis for each coating and material used in FG-TOPCOAT. The records shall be kept in a format acceptable to the AQD District Supervisor, and as a minimum, shall indicate the following:
   a. The daily and monthly number of jobs produced.
   b. The number of production days per month.
   c. The monthly usage rate of each material (in gallons – with water).
   d. For each coating material: Monthly records showing:
   e. The pounds of VOCs per gallon as applied (with water).
   f. The solids volume fraction.
   g. The prior to control free formaldehyde content and the weight percent melamine resin based on the supplier's SDS.
   h. The calculated average daily VOC emission rate in pounds per gallon of applied coating solids. Calculated VOC emissions rates in pounds per day (based upon a monthly proration) and tons per year based upon a 12-month rolling time period. Note, the VOC emission rates calculated should include acetone.

   All such records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

9. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR 64.7(d))**

10. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 64.7(c))**

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.[a] **(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.[a] **(R 336.1213(4)(c))**

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

[a] In accordance with Rule 213(2) and Rule 213(6), compliance with this streamlined reporting requirement established by R 336.1213(3)(c)(i) and R 336.1213(4)(c) shall be considered compliance with the reporting in/established by 40 CFR 60.395(b). If there is a deviation from an emission limit listed in 40 CFR 60.392, the site must submit a quarterly report as required by 40 CFR 60.395(b).

See Appendix 8-1

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. Topcoat Thermal Oxidizer (41)	88[2]	127[2]	**R 336.1225** **40 CFR 52.21 (c) & (d)**
2. Topcoat Spraybooth Basecoat Exhaust (13A)	156[2]	127[2]	**R 336.1225** **40 CFR 52.21 (c) & (d)**
3. Topcoat Spraybooth Clearcoat Observation Zone (16A)	52[2]	127[2]	**R 336.1225** **40 CFR 52.21 (c) & (d)**

IX. OTHER REQUIREMENT(S)

1. For the purposes of Compliance Assurance Monitoring (CAM), excursions will be defined as follows: **(40 CFR 64.6(c)(2))**
   a. A temperature excursion is defined as a failure to meet the specified temperature requirements in SC IV.1, IV.2 and IV.3.
   b. A monitoring excursion is defined as a failure to properly monitor as required by SC VI.2 and VI.3.
   c. A monitoring excursion is defined as a failure to properly implement and/or maintain requirements in SC VI.5 and VI.6a

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

3. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

4. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and IIII, as they apply to FG-TOPCOAT.[2] **(40 CFR Part 63, Subparts A and IIII)**

Section 1 - Automobile Manufacturing Facility

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-SOLVENTS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Solvents used for cleanup and purge of facility paint systems. A solvent recovery system is in place to recover solvents used in the purging of automatic spray guns. Also, included is a manual body wipe.

Emission Units: EU-PURGE, EU-OTHER SOLVENTS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	1325 Pounds[2]	Per Calendar Day	FG-SOLVENTS	SC VI.2	**R 336.1205 R 336.1224 R 336.1225**
2. VOC	161.9 Tons[2]	Per 12-Month Rolling Time Period	FG-SOLVENTS	SC VI.2	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21**
3. Acetone	698.9 Pounds[2]	Per Calendar Day	FG-SOLVENTS	SC VI.2	**R 336.1205 R 336.1224 R 336.1225**
4. Acetone	84.3 Tons[2]	Per 12-Month Rolling Time period	FG-SOLVENTS	SC VI.2	**R 336.1205 R 336.1224 R 336.1225**

Note: The total VOC mass emission limit for EU-PURGE-1 includes approximately 400 pounds per year of emissions from materials added to the water wash particulate control systems. Due to their small size, record keeping will not be required for those emissions.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. All waste materials shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The applicant shall install, maintain, and operate a purge solvent recovery system on the clearcoat automatic robots within each of the two topcoat booths.[2] **(R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21)**

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 applicant shall maintain a current listing from the manufacturer of the chemical composition of each coating and material including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21)**

2. The applicant shall keep monthly records, acceptable to the AQD District Supervisor, of the following information for FG-SOLVENTS:
   a. For each material used:
      i. A description of the material, and its VOC, and acetone content in pounds per gallon.
      ii. The total amount in gallons used and the amount used in the automatic zones of FG-SOLVENTS.
      iii. The amount in gallons reclaimed where applicable.
      iv. The purpose of the material (i.e., purge, body wipe/cleanup, etc.).
   b. VOC and acetone emissions calculations determining the total VOC and acetone mass emissions in pounds per calendar day (based upon a monthly proration) and tons per year based upon a 12-month rolling time period. In performing these calculations, the actual tested control efficiency over FG-SOLVENTS, by weight, shall be applied to the materials used in the controlled automatic zones.

   All such records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21)**

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 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

FG-REPAIR
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Spot and final repair operations

Emission Units: EU-SPOT REPAIR 1-4, EU-FINAL REPAIR 1

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs	4.8 lb/Gal (Minus Water) As Applied[2]	Daily Weighted Average	FG-REPAIR	SC VI.3	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(j)**
2. VOCs and acetone combined	212.2 Pounds[2]	Calendar Day	FG-REPAIR	SC VI.3	**R 336.1205 R 336.1224 R 336.1225**
3. VOCs and acetone combined	11.0 Tons[2]	12-month rolling time period as determined at the end of each calendar month	FG-REPAIR	SC VI.3	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(j)**

Note: The allowed mass VOC emission limits include acetone and the combined VOCs and acetone emissions shall not exceed the VOC emission limits.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. All waste coatings and VOC containing materials shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The VOC content of any coating or material as applied and as received shall be determined using federal Reference Test Method 24 or an alternative method approved by the AQD District Supervisor. Alternatively, the VOC content may be determined from manufacturer's formulation data. If the tested and the formulation values should differ, the tested results shall be used to determine compliance. Upon request of the AQD District Supervisor, the VOC content of any coating or material shall be verified by testing using federal Reference Test Method 24.[2] **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, 40CFR 52.21(j))**

See Appendix 5-1

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 end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.1702, 40 CFR 52.21(j))**

2. The applicant shall maintain a current listing from the manufacturer of the chemical composition of each coating and material, including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or both. The data shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

3. The applicant shall keep usage and VOC emissions calculations records on a monthly basis for each material (as received or as applied if applicable) used in FG-REPAIR. The records shall be kept in a format acceptable to the AQD District Supervisor and as a minimum shall indicate the following:
   a. A description of the material and its VOC content in pounds per gallon (minus water and with water, where applicable). Note, the VOC contents should include acetone.
   b. The monthly usage rate of each material.
   c. The amount of material reclaimed where applicable.
   d. The VOC emission calculations determining the total VOC mass emissions in pounds per calendar day (based upon a monthly proration) and tons per year based on a 12-month rolling time period. Note, the VOC emission rates calculated should include acetone.
   e. Monthly calculations of the average daily pounds of VOCs/gallon.

   All such records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**

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 8-1

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-Spot Repair 1 to 4 (19A)	86[2]	127[2]	**R 336.1225 40 CFR 52.12 (c) & (d)**
2. SV-Final Repair 1 (19B)	60[2]	50[2]	**R 336.1225 40 CFR 52.12 (c) & (d)**

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and IIII, as they apply to FG-REPAIR.[2]
   (40 CFR Part 63, Subparts A and IIII)

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

FG-TANKS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Nine storage tanks.

Emission Units: EU-GAS TANK 1, EU-GAS TANK 2, EU-AF TANK 1, EU-AF TANK 2, EU PR TANK 1, EU-METH TANK 2, EU-TF TANK 1, EU-BF TANK, EU-TF TANK 2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOCs and acetone combined	50.9 lb/day[2]	Calendar Day	FG-TANKS	SC VI.2	**R 336.1205 R 336.1224 R 336.1225**
2. VOCs and acetone combined	9.3 tpy[2]	12-month rolling time period as determined at the end of each calendar month	FG-TANKS	SC VI.2	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR 52.21(j)**

Note: The allowed mass VOC emission limits include acetone and the combined VOCs and acetone emissions shall not exceed the VOC emission limits.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The applicant shall not operate the gasoline storage tanks unless all applicable provisions of Rule 703 are met.[2] **(R 336.1205, R 336.1703, 40 CFR 52.21(j))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the end of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1299, R 336.1702, 40 CFR 52.21(j))**

2. The applicant shall keep monthly records, acceptable to the AQD District Supervisor, of the following information for FG-TANKS:
   a. For each tank:
      i. A description of the material added to or removed from the tank.
      ii. The total amount in gallons added to or removed from the tank.
   b. VOC emissions calculations determining the total VOC mass emissions in pounds per day (based upon a monthly proration) and tons per year based upon a 12-month rolling time period.

   All such records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.[2] **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(j))**

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 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and IIII, as they apply to FG-TANKS.[2] **(40 CFR Part 63, Subparts A and IIII)**

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

FG-AUTOMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Units: EU-ELECTROCOAT, EU-GLASS INSTALLATION, EU-GUIDECOAT, EU-TOPCOAT1, EU-TOPCOAT2, EU-SPOT REPAIR 1-4, EU-FINAL REPAIR 1, EU-SEALERS & ADHESIVES, EU-SOUND DAMP, EU-PURGE, EU-OTHER SOLVENTS, EU-PHOSPHATE

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Organic HAP	0.30 lb per GACS	Calendar month	**New –** FG-MACT WITH ECOAT	SC V.1 & VI.3	**40 CFR 63.3090(a)**
2. Organic HAP*	0.50 lb per GACS	Calendar month	**New –** FG-MACT	SC V.1 & VI.3	**40 CFR 63.3090(b)**
3. Organic HAP	0.01 lb per lb of coating	Calendar month	**New –** EU-SEALERS & ADHESIVES	SC V.1 & VI.3	**40 CFR 63.3090(c) or 63.3091(c)**
4. Organic HAP	0.01 lb per lb of coating	Calendar month	**New –**EU-Sound Damp	SC V.1 & VI.3	**40 CFR 63.3090(d) or 63.3091(d)**

- **FG-MACT** includes Guidecoat, Topcoat, Final Repair, Glass Bonding Primer, and Glass Bonding Adhesive operations plus all coatings and thinners, except for deadener materials and adhesive and sealers not part of glass bonding systems.
- **FG-MACT WITH ECOAT** also includes Electrocoat operations in addition to all the operations of FG-MACT.
- **EU-ADHESIVES& SEALERS** include only adhesives and sealers that are not part of glass bonding systems.

* The permittee may choose to comply with this limit if the requirements of SC I.5 is met.

5. The permittee may choose to comply with either SC I.1 or I.2. The permittee may choose to comply with SC I.2 only if Electrocoat system (EU-ELECTROCOAT) meets either of the following requirements. **(40 CFR 63.3092)**
   a. Each individual material added to EU-ELECTROCOAT contains no more than 1.0 percent by weight of any organic HAP and no less than 0.10 percent by weight of any organic HAP in Table 5 of 40 CFR Part 63 Subpart IIII., or
   b. The emissions from all Electrocoat bake ovens are captured and ducted to a CONTROL DEVICE having a minimum destruction or removal efficiency of at least 95 percent (by weight).

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

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

   The work practice plan shall not become part of the facility's Renewable Operating Permit (ROP). Revisions to the work practice plan likewise do not represent revisions to the facility's ROP. Copies of the current work practice plan and any earlier plan developed within the past 5 years are required to be made available for inspection and copying by the AQD upon request. **(40 CFR 63.3094)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.3130, 40 CFR 63.3131)**

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

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

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

See Appendix 5-1

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.3131)**

1. The permittee shall compile all required records and complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the end of the calendar month following each compliance period unless otherwise specified in any monitoring/recordkeeping condition. **(R 336.1213(3))**

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

3. The permittee shall maintain, at a minimum, the following records as of the applicable compliance date, for each compliance period:
   a. A copy of each notification and report that is submitted to comply with 40 CFR Part 63, Subpart IIII and the documentation supporting each notification and report. **(40 CFR 63.3130(a))**
   b. A current copy of information provided by materials suppliers or manufactures, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP for each coating, thinner and cleaning material, the density for each coating and thinner, and the volume fraction of coating solids for each coating. **(40 CFR 63.3130(b))**
   c. For each coating or thinner used in FG-MACT, the volume used in each month, the mass fraction organic HAP content, the density, and the volume fraction of solids. **(40 CFR 63.3130(c))**
   d. For each material used in EU-SEALERS & ADHESIVES, EU-SOUND DAMP, the mass used in each month and the mass organic HAP content. **(40 CFR 63.3130(c))**
   e. Calculations of the organic HAP emission rate for FG-MACT in pounds per gallon of applied coating solids. If permittee chooses to comply with the option identified in SC I.5.a., a record of the weight fraction of each organic HAP in each material added to the Electrocoat system. These calculations and records must include all raw data, algorithms, and intermediate calculations. If the ''Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations,'' EPA–450/3–88–018 (Docket ID No. OAR–2002–0093 and Docket ID No. A–2001–22), is used, all data input to this protocol must be recorded. If these data are maintained as electronic files, the electronic files, as well as any paper copies must be maintained. **(40 CFR 63.3130(c), 40 CFR 63.3163, 40 CFR 63.3173)**
   f. Calculation of the average monthly mass organic HAP content in pounds per pound of coating, for EU-SEALERS & ADHESIVES, and EU-SOUND DAMP combined. **(40 CFR 63.3130(c), 40 CFR 63.3152)**
   g. The name, volume, mass fraction organic HAP content and density of each cleaning material used. **(40 CFR 63.3130(d) - (f))**

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. **(40 CFR 63.3120(a)(1), R 336.1213(3)(c)(i))**

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

4. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.3120(a). These reports shall be due March 15 for the reporting period July 1 to December 31 and September 15 for the reporting period January 1 to June 30. (40 CFR 63.3120(a)The permittee must submit the semiannual compliance report required in 40 CFR 63.3920(a) to the USEPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (*https://cdx.epa.gov/*). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (*https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-datareporting-interface-cedri*). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the USEPA at the appropriate addresses listed in 40 CFR 63.13. Once the form has been available in CEDRI for 1 year begin submitting all subsequent reports via CEDRI. **(40 CFR 63.3120(f))**

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

FG-OLD
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Organic Liquid Distribution (OLD) (non-gasoline) operations at major sources of HAP emissions. Specifically, these conditions cover existing (construction pre-dates April 2, 2002) liquid storage tanks which hold more than 5,000 gallons but less than 50,000 gallons and/or new liquid storage tanks which hold more than 5,000 gallons but less than 10,000 gallons of methanol/windshield washer fill solvents that are dispensed to newly assembled vehicles.

Emission Unit: EU-METH TANK 2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(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 keep documentation, including a record of the annual average true vapor pressure of the total Table 1 Organic liquid that verifies the storage tank is not required to be controlled under this subpart. The documentation shall be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review. **(40 CFR 63.2343(b)(3))**

VII. REPORTING

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

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

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

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

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

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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

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

FG-AUTOPLANT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

This flexible group covers conditions which apply to all of the equipment included in this permit.

Emission Units: EU-ELECTROCOAT, EU-GUIDECOAT, EU-TOPCOAT1, EU-TOPCOAT2, EU-SEALERS & ADHESIVES, EU-GLASS INSTALLATION, EU-VEHICLE FUEL FILL, EU-NATURAL GAS, EU-PURGE, EU-OTHER SOLVENTS, EU-SPOT REPAIR 1-4, EU-FINAL REPAIR 1, EU-GAS TANK 1, EU-GAS TANK 2, EU-AF TANK 1, EU-AF TANK 2, EU-PR TANK 1, EU-METH TANK 2, EU-TF TANK, EU-BF TANK, EU-PSF TANK, EU-PHOSPHATE, EU-SOUND DAMP, EU-BODY SHOP.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The production rate shall not exceed 74 jobs per hour. A job is defined as a completely assembled vehicle off the final assembly line.[1] **(R 336.1225)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

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

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

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

Section 1 - Automobile Manufacturing Facility

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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

FG-SI RICE MACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, spark ignition RICE greater than 300 bph and less than 500 bhp.

Emission Unit: EU-EMERGENCY SI ENGINE 1

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each engine in FG-SI RICE MACT shall be installed, maintained, and operated in a satisfactory manner. A list of recommended work practice standards as specified in 40 CFR 63.6602 and Table 2c, Item 6 or the permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices. The following are the recommended work practices specified in 40 CFR Part 63, Subpart ZZZZ Table 2c: Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2,
   b. Inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ Table 2c, Item 6)**

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c of 40 CFR Part 63, Subpart ZZZZ. **(40 CFR 63.6625(j))**

3. The permittee shall install, maintain and operate each engine in FG-SI RICE MACT and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6605, 40 CFR 63.6625(e))**

4. The permittee shall minimize the time spent at idle during startup and minimize the startup time of each engine in FG-SI RICE MACT to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**

5. The permittee shall not allow each engine in FG-SI RICE MACT to exceed 100 hours per calendar year for maintenance checks and readiness testing and emergency demand response. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2)(i))**

6. The permittee may operate each engine in FG-SI RICE MACT up to 50 hours per calendar year for non-emergency situations, but those hours are to be counted towards the 100 hours per calendar year for maintenance and testing and emergency demand response, as allowed in 40 CFR 63.6640(f)(2). **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a non-resettable hour meter on each engine in FG-SI RICE MACT. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

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

1. If using the oil analysis program in order to extend the specified oil change requirement in 40 CFR Part 63, Subpart ZZZZ Table 2c, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. **(40 CFR 63.6625(j))**

See Appendix 5-1

VI. MONITORING/RECORDKEEPING

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

1. For each engine in FG-SI RICE MACT, the permittee shall keep in a satisfactory manner, records of the occurrence and duration of each malfunction of operation or the air pollution control monitoring equipment. The permittee shall keep all records on file and make them available to the department upon request.
(40 CFR 63.6655(a)(2), 40 CFR 63.6660)

2. For each engine in FG-SI RICE MACT, the permittee shall keep in a satisfactory manner, records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. The permittee shall keep all records on file and make them available to the department upon request.
(40 CFR 63.6655(a)(5), 40 CFR 63.6660)

3. For each engine in FG-SI RICE MACT, the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with operating limitations in SC III.3. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(d), 40 CFR 63.6660)**

4. For each engine in FG-SI RICE MACT, the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**

5. For each engine in FG-SI RICE MACT, the permittee shall keep in a satisfactory manner, records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(f), 40 CFR 63.6660)**

VII. REPORTING

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

2. 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))**

6. If you own or operate an emergency stationary RICE with a site rating of more than 100 brake hp that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in 40 CFR 63.6640(f)(4)(ii), you must submit an annual report according to the requirements below and as specified in 40 CFR 63.6650(h):
   a. The report must contain the following information:
      i. Company name and address where the engine is located.
      ii. Date of the report and beginning and ending dates of the reporting period.
      iii. Engine site rating and model year.
      iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
      v. Hours operated for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).
      vi. Number of hours the engine is contractually obligated to be available for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).
      vii. Hours spent for operation for the purpose specified in 40 CFR 63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.
      viii. If there were no deviations from the fuel requirements in 40 CFR 63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.
      ix. If there were deviations from the fuel requirements in 40 CFR 63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.
   b. The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.
   c. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data

Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13**. (40 CFR 63.6650(h), 40 CFR 63.6660)**

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date. **(40 CFR 63.6595, 40 CFR Part 63, Subparts A and ZZZZ)**

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

FG-CI RICE MACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at a major source of HAP emissions, existing emergency, compression ignition RICE less than 500 bhp.

Emission Units: EU-EMERGENCY FIRE PUMP 1, EU-EMERGENCY FIRE PUMP 2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each engine in FG-CI RICE MACT shall be installed, maintained, and operated in a satisfactory manner. A list of recommended work practice standards as specified in 40 CFR 63.6602 and Table 2c, Item 6 or the permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices. The following are the recommended work practices specified in 40 CFR Part 63, Subpart ZZZZ Table 2c: Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2,
   b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

   If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 6)**

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c of 40 CFR Part 63, Subpart ZZZZ. **(40 CFR 63.6625(j))**

3. The permittee shall install, maintain and operate each engine in FG-CI RICE MACT and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 63.6605, 40 CFR 63.6625(e))**

4. The permittee shall minimize the time spent at idle during startup and minimize the startup time of each engine in FG-CI RICE MACT to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**

5. The permittee shall not allow each engine in FG-CI RICE MACT to exceed 100 hours per calendar year for maintenance checks and readiness testing and emergency demand response. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2)(i))**

6. The permittee may operate each engine in FG-CI RICE MACT up to 50 hours per calendar year for non-emergency situations, but those hours are to be counted towards the 100 hours per calendar year for maintenance and testing and emergency demand response, as allowed in 40 CFR 63.6640(f)(2). **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install a non-resettable hour meter on each engine in FG-CI RICE MACT. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

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

1. If using the oil analysis program in order to extend the specified oil change requirement in 40 CFR Part 63, Subpart ZZZZ Table 2c, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. **(40 CFR 63.6625(j))**

See Appendix 5-1

VI. MONITORING/RECORDKEEPING

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

1. For each engine in FG-CI RICE MACT the permittee shall keep in a satisfactory manner, records of the occurrence and duration of each malfunction of operation or the air pollution control monitoring equipment. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(2), 40 CFR 63.6660)**

2. For each engine in FG-CI RICE MACT the permittee shall keep in a satisfactory manner, records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(5), 40 CFR 63.6660)**

3. For each engine in FG-CI RICE MACT the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with operating limitations in SC III.3. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(d), 40 CFR 63.6660)**

4. For each engine in FG-CI RICE MACT the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**

5. For each engine in FG-CI RICE MACT the permittee shall keep in a satisfactory manner, records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(f), 40 CFR 63.6660)**

VII. REPORTING

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

2. 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))**

6. If you own or operate an emergency stationary RICE with a site rating of more than 100 brake hp that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in 40 CFR 63.6640(f)(4)(ii), you must submit an annual report according to the requirements below and as specified in 40 CFR 63.6650(h):
   a. The report must contain the following information:
      i. Company name and address where the engine is located.
      ii. Date of the report and beginning and ending dates of the reporting period.
      iii. Engine site rating and model year.
      iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
      v. Hours operated for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).
      vi. Number of hours the engine is contractually obligated to be available for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).
      vii. Hours spent for operation for the purpose specified in 40 CFR 63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.
      viii. If there were no deviations from the fuel requirements in §63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.
      ix. If there were deviations from the fuel requirements in 40 CFR 63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.
   b. The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.
   c. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13. **(40 CFR 63.6650(h), 40 CFR 63.6660)**

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date. **(40 CFR 63.6595, 40 CFR Part 63, Subparts A and ZZZZ)**

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

FG-COLDCLEANERS
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

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

Emission Unit: NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. **(R 336.1611(2)(b), R 336.1707(3)(b))**

2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
   a. The air/vapor interface of the cold cleaner is no more than ten square feet. **(R 336.1281(2)(h))**
   b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(2)(r)(iv))**

2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**

3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**

5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
   a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
   b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
   c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**

2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
   a. A serial number, model number, or other unique identifier for each cold cleaner.
   b. The date the unit was installed, manufactured or that it commenced operation.
   c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(2)(h).
   d. The applicable Rule 201 exemption.
   e. The Reid vapor pressure of each solvent used.
   f. If applicable, the option chosen to comply with Rule 707(2).

3. The permittee shall maintain 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

FG-BOILERMACT
FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Requirements for boilers and process heaters with a heat input capacity of <10 MMBTU/hr for major sources of HAP emissions per 40 CFR Part 63, Subpart DDDDD (Boiler MACT). These boilers or process heaters are designed to burn gaseous fuels.

Emission Units:

Greater than 5 MMBTU/hr and less than 10 MMBTU/hr that burns gaseous or light liquid fuels or any unit that is less than 10 MMBTU/hr and burns any heavy liquid or solid fuels	EU-CBBoiler01, EU-CBBoiler02, EU-CBBoiler03, EU-CBBoiler04, EU-CBBoiler05

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must, for boilers or process heaters installed after June 4, 2010, with a heat input capacity of greater than 5 MMBTU/hr and less than 10 MMBTU/hr, complete an initial tune-up as specified in SC III.3 by no later than 25 months after initial startup. **(40 CFR 63.7510(g))**

2. The permittee must, for boilers or process heaters with a heat input capacity of greater than 5 MMBTU/hr and less than 10 MMBTU/hr, conduct a biennial tune-up of the boiler or process heater according to 40 CFR 63.7540(a)(11) no more than 25 months after the previous tune-up. **(40 CFR 63.7500(e), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(11), 40 CFR Part 63, Subpart DDDDD, Table 3.2)**

3. The permittee must conduct a tune-up of each boiler or process heater as specified in the following: (40 CFR 63.7540(a)(11) or (12))
    a. As applicable, inspect the burner and clean or replace any components of the burner as necessary. The permittee may perform the burner inspection any time prior to the tune-up or may delay the burner inspection until the next scheduled unit shutdown. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. (40 CFR 63.7540(a)(10)(i))
    b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (40 CFR 63.7540(a)(10)(ii))

c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The permittee may delay the inspection until the next scheduled unit shutdown. **(40 CFR 63.7540(a)(10)(iii))**

d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**

e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**

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

5. At all times, the permittee must operate and maintain each small boiler or process heater, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500(a)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or 2 year compliance report or one-time energy assessment, as applicable, that the permittee submitted. **(40 CFR 63.7555(a)(1))**

2. The permittee must keep the records in a form suitable and readily available for expeditious review. **(40 CFR 63.7560(a))**

3. The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.7560(b))**

4. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee can keep the records off site for the remaining 3 years. **(40 CFR 63.7560(c))**

VII. REPORTING

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

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

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

4. The permittee must submit boiler or process heater tune-up compliance reports to the appropriate AQD District Office and must be postmarked or submitted by March 15th of the year following the applicable 2-year period starting from January 1 of the year following the previous tune-up to December 31 (of the latest tune-up year). Compliance reports must also be submitted to EPA using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to EPA Region 5. (40 CFR 63.7550(b), 40 CFR 63.7550(h)(3))

5. The permittee must include the following information in the compliance report. (40 CFR 63.7550(c)(1))
    a. Company and Facility name and address. (40 CFR 63.7550(c)(5)(i))
    b. Process unit information, emissions limitations, and operating parameter limitations. (40 CFR 63.7550(c)(5)(ii))
    c. Date of report and beginning and ending dates of the reporting period. (40 CFR 63.7550(c)(5)(iii))
    d. Include the date of the most recent tune-up for each unit. Include the date of the most recent burner inspection if it was not done biennially or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (40 CFR 63.7550(c)(5)(xiv))
    e. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. (40 CFR 63.7550(c)(5)(xvii))

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 1-1. 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_2e	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
		HAP	Hazardous Air Pollutant
EGLE	Michigan Department of Environment, Great Lakes, and Energy	Hg	Mercury
		hr	Hour
EU	Emission Unit	HP	Horsepower
FG	Flexible Group	H_2S	Hydrogen Sulfide
GACS	Gallons of Applied Coating Solids	kW	Kilowatt
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	m	Meter
HVLP	High Volume Low Pressure*	mg	Milligram
ID	Identification	mm	Millimeter
IRSL	Initial Risk Screening Level	MM	Million
ITSL	Initial Threshold Screening Level	MW	Megawatts
LAER	Lowest Achievable Emission Rate	NMOC	Non-methane Organic Compounds
MACT	Maximum Achievable Control Technology	NO_x	Oxides of Nitrogen
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	Particulate Matter equal to or less than 10 microns in diameter
NA	Not Applicable		
NAAQS	National Ambient Air Quality Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	pph	Pounds per hour
		ppm	Parts per million
NSPS	New Source Performance Standards	ppmv	Parts per million by volume
NSR	New Source Review	ppmw	Parts per million by weight
PS	Performance Specification	%	Percent
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge
PTI	Permit to Install	scf	Standard cubic feet
RACT	Reasonable Available Control Technology	sec	Seconds
ROP	Renewable Operating Permit	SO_2	Sulfur Dioxide
SC	Special Condition	TAC	Toxic Air Contaminant
SCR	Selective Catalytic Reduction	Temp	Temperature
SNCR	Selective Non-Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TEQ	Toxicity Equivalence Quotient	µg	Microgram
USEPA/EPA	United States Environmental Protection Agency	µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
VE	Visible Emissions	yr	Year

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

Appendix 2-1. 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 3-1. 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 4-1. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EU-SEALERS & ADHESIVES. Alternative formats must be approved by the AQD District Supervisor.

General – Keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for each respective add-on control device used to demonstrate compliance with applicable particulate emission limits.

Regenerative Thermal Oxidizers

- Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.

- Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months.*

- Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months. *

    * The requirement to address this issue is satisfied if a performance test (*i.e.,* stack test) has been performed on the control device within the prior 18-month period.

Appendix 5-1. 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 6-1. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N6950-2014. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-N6950-2014a is being reissued as Source-Wide PTI No. MI-PTI-N6950-2020.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)

Appendix 7-1. Emission Calculations

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

Appendix 8-1. 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.

1. **VI.**

LANSING DELTA TOWNSHIP ASSEMBLY (LDT)
CAM PLAN DESCRIPTION – ELECTROCOAT
Revision Date: September 19, 2024

I. BACKGROUND

A. Emission Unit

Description: An electrocoat dip tank followed by an electrocoat curing oven. VOC emissions from both are controlled by an ELPO Thermal Oxidizer. After electrocoat and prior to the primer surfacer system, manual wet sanding of the vehicle may be performed to correct minor imperfections in the prime coat. The electrocoat sand operation is located in the paint shop and emissions from this operation are sent through a filter and vented back into the plant.

Identification: EU-ELECTROCOAT

Facility: General Motors LLC - Lansing Delta Township
8175 Millett Highway
Lansing, Michigan 48917

B. Applicable Regulation, Emission Limit, Monitoring Requirements

Permit Number: MI-ROP-N6950-2020a

Emission Limits:

Pollutant	Limit	Time Period/ Operating Scenario	Underlying Applicable Requirements
1. VOCs	0.04 lb/GACS	Calendar month average	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR Part 52.21(j) 40 CFR Part 60, Subpart MM**
2. VOCs and acetone combined	67.9 lb/day	Per Calendar Day	**R 336.1205 R 336.1224 R 336.1225**
3. VOCs and acetone combined	8.8 Tons	12-month rolling timer period as determined at the end of each calendar month	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR Part 52.21(j) 40 CFR Part 60, Subpart MM**
4. VOCs	1.41 lb/GACS	Monthly	**40 CFR 60.392**

Monitoring Requirements: RTO combustion chamber temperature

Potential Pre-Control Emissions: 175.4 tons VOC per year

C. Control Technology

EU-ELECTROCOAT has one RTO with a minimum destruction efficiency of 95%. Based on the September 28, 2022 performance test, the tested inlet flow rate of the RTO is 17,962 scfm.

II. MONITORING APPROACH

	Compliance Indicator: RTO Temperature
A. Indicator	RTO combustion temperature is measured with two thermocouples, one per combustion chamber. The average of the two readings is used for compliance with the minimum temperature required by the permit. The temperatures are monitored continuously and recorded at equally spaced intervals at least once every 15 minutes.
B. Indicator Range	The RTO temperature shall be a minimum temperature of 1400°F.
C. Bypass System Detection	The permit emission unit, EU-ELECTROCOAT, special condition no. VI.4 requires bypass monitoring, during production, for each bypass valve such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made.

III. PERFORMANCE CRITERIA

	Compliance Indicator: RTO Temperature
A. Data Representativeness	There is a thermocouple located in each combustion chamber.
B. Verification of Operational Status	NA - The system is not new and has not been modified
C. QA/QC Practices and Criteria	Validation of thermocouple accuracy or recalibration of each thermocouple a minimum will occur once every 12 months. The thermocouple may be replaced in lieu of validation.
D. Monitoring Frequency	Continuous, and recorded at equally spaced intervals at least once every 15 minutes.
E. Data Collection Procedures and Averaging Period; and excursion determination	GM collects the temperature records on the Yokogawa data historian from the average of the two thermocouples at least every 15 minutes during coating operations. Compliance with the minimum combustion temperature is based upon the average combustion temperature recorded every 15 minutes. Further, GM calculates three-hour averages of the combustion temperature when any one data point falls below the minimum required temperature, per EU-ELECTROCOAT, special condition no. IV.1. Excursions are defined as the following: a. A temperature excursion is defined as a failure to meet 1400°F for any three-hour period during production. b. A monitoring excursion is defined as a failure to monitor and record temperature as required per EU-ELECTROCOAT, VI.2. c. A monitoring excursion is defined as a failure to properly implement and/or maintain requirements in EU-ELECTROCOAT, VI.4 and VI.6.a. Note: the averaging time for a temperature excursion is 3 hours. Upon confirming an excursion, the site will follow the requirements of EU-ELECTROCOAT VI.7.

IV. Justification

A. Rational for Selection of Performance Indicators

The RTO combustion chamber temperature was selected because it is indicative of the VOC destruction occurring within the RTO and is a widely accepted method of monitoring. If the chamber temperature decreases significantly, then complete combustion may not occur, reducing the destruction efficiency. Therefore, the requirement to monitor temperature and maintain appropriate records is a justification for assuring VOC destruction efficiency. Temperature monitoring is specifically identified in the monitoring/recordkeeping requirements under the current ROP emission unit, EU-ELECTROCOAT.

B. Rational for Selection of Indicator Ranges

The selected indicator is the minimum average combustion chamber temperature of 1400°F. This minimum temperature is specified in the current ROP under EU-ELECTROCOAT design/equipment parameters.

C. Performance Test

The last VOC Destruction Efficiency performance testing of the ELPO was performed on September 28, 2022. The destruction efficiency was 95.9%. This demonstrated compliance with the permit required minimum of 95%. A test plan was submitted to the EGLE for review and approval on 8/25/2022. A copy of the test plan is attached.

LANSING DELTA TOWNSHIP ASSEMBLY (LDT)
CAM PLAN DESCRIPTION – TOPCOAT
Revision Date: September 30, 2024

I. BACKGROUND

A. Emission Unit

Description: Two identical topcoat processes. Each is used to apply both basecoat and clearcoat to vehicle bodies. VOC emissions are controlled by a regenerative thermal oxidizer (RTO) and two parallel rotary carbon concentrator (RCC) adsorption units.

Identification: FG-TOPCOAT

Facility: General Motors LLC - Lansing Delta Township
8175 Millett Highway
Lansing, Michigan 48917

B. Applicable Regulation, Emission Limit, Monitoring Requirements

Permit Number: MI-ROP-N6950-2020a

Emission Limits:

Pollutant	Limit	Time Period/ Operating Scenario	Underlying Applicable Requirements
1. VOCs	5.42 lb/GACS	Calendar Day Averaging	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR Part 52.21(j) 40 CFR Part 60, Subpart MM**
2. VOCs and acetone combined	4,516 Pounds	Calendar Day	**R 336.1205 R 336.1224 R 336.1225**
3. VOCs and acetone combined	583.6 Tons	12-month rolling time period as determined at the end of each calendar month	**R 336.1205 R 336.1224 R 336.1225 R 336.1702(a) 40 CFR Part 52.21(j) 40 CFR Part 60, Subpart MM**
4. VOCs	12.2 lb/GACS	Monthly	**40 CFR 60.392**

Monitoring Requirements: RTO combustion chamber temperature and RCC desorption gas inlet temperature

Potential Pre-Control Emissions: 1313.4 tons VOC per year

C. Control Technology

The FG-TOPCOAT control system is made up of two parallel rotary carbon concentrators and one RTO. The automatic zones of the clearcoat spray booths are controlled by the two parallel rotary carbon concentrators (RCC). The RCCs use carbon adsorption to capture the VOCs from the large volume (low VOC concentration) exhaust stream and then transfer the VOCs to a smaller volume (heavily concentrated) air stream via desorption. The concentrated VOCs are then destroyed by the RTO. The basecoat heated flash zones and the topcoat ovens are controlled by the RTO directly. Based on the May 9, 2023 performance test, the tested inlet flow rate of the RTO is 33,176 dscfm. Based on the June 23, 2020 performance test, the tested inlet flow of the concentrator is 66,944 scfm.

II. MONITORING APPROACH

	RCC Wheel Motion	RCC Temperature	RTO Temperature
A. Indicator	Continuous motion/ rotation of the adsorbent wheel	The RCC desorption gas inlet temperature is measured with one thermocouple which is used for compliance with the minimum temperature required by the permit. The temperatures are monitored continuously and recorded at equally spaced intervals at least once every 15 minutes.	RTO combustion temperature is measured with two thermocouples, one per combustion chamber. The average of the two readings is used for compliance with the minimum temperature required by the permit. The temperatures are monitored continuously and recorded at equally spaced intervals at least once every 15 minutes.
B. Indicator Range	The motion sensor output is monitored by the system PLC to determine system status. A system alarm occurs in the event that motion is not detected.	The RCC desorption gas inlet temperature shall be above the temperature from the most recent acceptable performance test minus 15°F. The temperature of the most recent test was 271°F.	The RTO temperature shall be a minimum temperature of 1400°F.
C. Bypass System Detection	The permit flexible group, FG-TOPCOAT, special condition no. VI.5 requires bypass monitoring, during production, for each bypass valve such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made.		

III. PERFORMANCE CRITERIA

	RCC Wheel Motion	RCC Temperature	RTO Temperature
A. Data Representativeness	There are two carbon wheels, and each has a Read Switch to sense motion.	There is one thermocouple located in the combined duct upstream of the RCCs.	There is a thermocouple located in each combustion chamber.
B. Verification of Operational Status	NA – The system is not new and has not been modified		
C. QA/QC Practices and Criteria	N/A Note: A system priority fault results if wheel movement is not detected.	Validation of thermocouple accuracy or recalibration of each thermocouple a minimum will occur once every 12 months. The thermocouple may be replaced in lieu of validation.	Validation of thermocouple accuracy or recalibration of each thermocouple a minimum will occur once every 12 months. The thermocouple may be replaced in lieu of validation.
D. Monitoring Frequency	Continuous, not recorded	Continuous, and recorded at equally spaced intervals at least once every 15 minutes.	Continuous, and recorded at equally spaced intervals at least once every 15 minutes.
E. Data Collection Procedures and Averaging Period; and excursion determination	A system alarm occurs in the event that motion is not detected.	GM collects the temperature records on the Yokogawa data historian from the average of the two RTO thermocouples and the RCC inlet desorption gas at least every 15 minutes during coating operations. Further, GM calculates three-hour averages of the combustion temperatures or desorption inlet gas temperatures when any one data point falls below the minimum required temperature, per FG-TOPCOAT, SC. IV.1, IV.2 and IV.3. Excursions are defined as the following: a. A temperature excursion is defined as a failure to meet the temperature requirements of FG-TOPCOAT SC. IV.1, IV.2 and IV.3. b. A monitoring excursion is defined as a failure to monitor and record temperature as required per FG-Topcoat-S1, SC. VI.2 and VI.3. c. A monitoring excursion is defined as a failure to properly implement and/or maintain requirements in FG-TOPCOAT, SC VI.5 and VI.6.a. Note: the averaging time for a temperature excursion is 3 hours.	

		Upon confirming an excursion, the site will follow the requirements of FG-TOPCOAT, SC VI.9.

IV. Justification

A. Rational for Selection of Performance Indicators

The average RTO combustion chamber temperature and the RCC inlet desorption gas temperature are both selected because they are indicative of the VOC destruction occurring within the RTO and VOC removal occurring in the RCC and are both widely accepted methods of monitoring. If the chamber temperature decreases significantly, then complete combustion may not occur, reducing the destruction efficiency. Therefore, the requirement to monitor temperature and maintain appropriate records is a justification for assuring VOC destruction efficiency. If the inlet desorption temperature decreases significantly, then proper VOC removal cannot take place, reducing removal efficiency. Therefore, the requirement to monitor temperature and maintain appropriate records is a justification for assuring VOC removal efficiency. Temperature monitoring is specifically identified in the monitoring/recordkeeping requirements under the current ROP flexible group, FG-TOPCOAT

B. Rational for Selection of Indicator Ranges

The selected indicator for the RTO is the minimum average combustion chamber temperature of 1400°F which is required to meet 95% destruction efficiency. This minimum temperature is specified in the current ROP under FG-TOPCOAT design/equipment parameters. The selected indicator of the RCC is maintaining the temperature above the temperature from the most recent acceptable performance test minus 15°F.

C. Performance Test

The last VOC RTO Destruction Efficiency testing was performed on May 9, 2023. The RTO destruction efficiency was 98.6%. This demonstrated compliance with the permit required minimum of 95%. The last RCC Removal Efficiency performance testing was performed on June 23, 2020. The removal efficiency was 97.5%.

GM LLC Lansing Delta Township
Work Practice Plan for the Minimization of Organic HAP Emissions

Pursuant to Paragraph 63.3094 of NESHAP Subpart IIII, General Motors Lansing Delta Township facility has developed a work practice plan (WPP) as required by the rule. The purpose of the plan is to minimize organic Hazardous Air Pollutant (HAP) emissions from the following activities:

1. The storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established under §63.3090(a) through (d) or §63.3091(a) through (d). These coating operations include ELPO, primer surfacer, topcoat, final repair, glass bonding adhesive operations, sealers and adhesives, and deadener.

2. The cleaning and the purging of equipment associated with all coating operations for which emission limits are established under §63.3090(a) through (d) or §63.3091(a) through (d).

The plan details are identified in the following paragraphs.

I. Identify HAP containing materials subject to the work plan requirements.

LDT reviewed the formulation data contained on supplier Safety Data Sheets or requested HAP content from suppliers to identify the HAP containing coatings, thinners, and cleaning materials. LDT then reviewed plant operations to identify where the identified materials are stored, mixed, conveyed, and/or used as equipment cleaning or purging solvents.

The materials, location, and uses are summarized in Appendix - Part (a).

II. Work Practices addressing HAP emissions from storage, mixing, and conveying of organic HAP-containing coatings, thinners, cleaning materials, and waste materials as identified in Paragraph I.

A. Storage Work Practice (63.3094(b) (1))

The facility has implemented the following storage practices and procedures:

1. Floor personnel are instructed to store materials in closed containers and to close any containers that they observe open.
2. Facility personnel conduct periodic reviews for container status and will close open containers if found. In addition, if containers are found open, personnel in the area will be reinstructed to close containers when not in use.

B. Spill Prevention Work Practice (63.3094(b) (2))

The facility has implemented the following practices to minimize the risk of spills:

1. Materials will be stored indoors in designated areas to the extent practicable to minimize the risk of container puncture during storage or handling. Example areas are as follows:
    a. Low traffic areas
    b. Paint mix room
    c. Walled areas
    d. Flammable cabinets
    e. Storage tanks
2. Personnel are instructed to store materials, to the extent practical, indoors in areas with containment, curbing, and / or sloped floors.
3. Storage tanks will be equipped with high level alarms to prevent overfilling.
4. Load / unload activities are monitored by a GM representative and are stopped immediately should material be leaked or spilled. The environmental response plan will be initiated to clean up the leak or spill.
5. Material handling and transfer operations are conducted according to specific work plans developed for the function or in accordance with good engineering practices.
6. Employees will be trained pursuant to the Resource Conservation and Recovery Act (RCRA) and Storm Water Pollution Prevention (SWPP), as appropriate.

C. Material Conveyance (63.3094(b) (3))

The facility has implemented the following practices and procedures for material conveyance:

Materials are conveyed in pipes for the following activities:

1. Delivery of paint from the paint recirculation systems to the paint booths
2. Delivery of purge solvent from the paint mix room to the paint booths
3. Recovery of the purge solvent to the reclaimed purge solvent tank
4. Delivery of equipment cleaning solvents and/or booth coatings to the booths.

Materials that are not conveyed in pipes will be transferred in closed containers.

D. Mixing vessels (63.3094(b) (4))

Appropriate personnel are trained to keep mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials closed except when adding to, removing, or mixing the contents.

E. Cleaning of storage, mixing and conveying equipment (63.3094(b) (5))

The facility has implemented the following practices and procedures for the cleaning of storage, mixing, and conveying equipment.

The requirement for the plan to minimize organic HAP emissions during cleaning of storage, mixing, and conveying equipment is satisfied by the implementation of some or all of the activities listed below. LDT will implement one or more of these as appropriate for LDT, taking into consideration the particular operation and activities involved.

Examples of practices which will be considered:

1. Use of low or no HAP cleanup materials.
2. Use of closed loop, recirculating cleaning practices.
3. Minimize to the extent possible, the usage of organic HAP containing cleaning materials.
4. Manage materials in closed containers.

III. Implement work practices to minimize organic HAP emissions from cleaning and from purging of equipment associated with all coating operations for which emission limits are established under §63.3090(a) through (d) or §63.3091(a) through (d).

A. Vehicle body wipe emissions (63.3094 (c)(1)(i))

LDT will use one or more of the following techniques for vehicle body wipe processes.

1. Use of solvent-moistened wipes.
2. Keeping solvent containers closed when not in use.
3. Keeping wipe disposal/recovery containers closed when not in use.
4. Use of tack-wipes.
5. Use of solvents containing less than 1 percent organic HAP by weight.

The following table identifies the body wiping operations and the techniques in use.

Operation	Location	Technique
Body Wiping	Paint Shop Sealer Deck Paint Shop Preprime Paint Shop Pretopcoat Paint Shop Moist Sand Paint Shop Spot Repair GA Final Paint Repair	1 (Isopropyl alcohol premoistened wipes), 3, 4
Urethane cleanup	GA Windshield Install	3, 5 (Isopropyl Alcohol / water mix)
Body Wiping	GA Water Test Booth Repair	1 (Isopropyl Alcohol premoistened wipes), 3

Coating line purging emissions (63.3094 (c)(1)(ii))

LDT will use one or more of the following for coating line purging processes:

1. Air/solvent push-out.
2. Capture and reclaim or recovery of purge materials (excluding applicator nozzles/tips).
3. Block painting to the maximum extent feasible.
4. Use of low-HAP or no-HAP solvents for purge.

The following table identifies the purging operations and the techniques in use.

Operation	Location	Technique
Basecoat	Paint Shop	4 (Gage Hydropurge 36611)
Clearcoat	Paint Shop	1, 2

B. Flushing of coating systems (63.3094 (c)(1)(iii))

LDT will use one or more of the following for the flushing of coating systems:

1. Keeping solvent tanks closed.
2. Recovering and recycling solvents.
3. Keeping recovered/recycled solvent tanks closed.
4. Use of low-HAP or no-HAP solvents

Operation	Location	Technique
Basecoat	Paint Shop	1, 2, 3, 4 (Hot RO water, Aquastrip 609 used to clean BC systems)
Clearcoat	Paint Shop	1, 2, 3

C. Cleaning of spray booth grates (63.3094 (c)(1)(iv))

LDT will use one or more of the following for the cleaning of spray booth grates:

1. Controlled burn-off.

2. Rinsing with high-pressure water (in place).
3. Rinsing with high-pressure water (off line).
4. Use of spray-on masking or other type of liquid masking.
5. Use of low-HAP or no-HAP content cleaners.

The following table identifies the spray booth and the techniques in use.

Operation	Location	Technique
Basecoat booths	Paint Shop	2 (10 K High Pressure Water) (For information only: grates with a permanent barrier coating are in use. May use a barrier coat if needed)
Clearcoat booths	Paint Shop	2 (40 K High Pressure Water Mowers - Spinjets)

D. <u>Cleaning of spray booth walls (63.3094 (c)(1)(v))</u>

LDT will use one or more of the following for the cleaning of spray booth walls:

1. Use of masking materials (contact paper, plastic sheet, or other similar type of material).
2. Use of spray-on masking.
3. Use of rags and manual wipes instead of spray application when cleaning walls.
4. Use of low-HAP or no-HAP content cleaners.
5. Controlled access to cleaning solvents.

The following table identifies the spray booth and the techniques in use.

Operation	Location	Technique
Basecoat booths	Paint Shop	2 (Gage S-900B Tacky Clear Booth Coat, 71900 GageSol Coating, 4 (Gage Hydropurge 36611 / RO mix – brushed on) and low-pressure water spray
Clearcoat booths	Paint Shop	2 (Gage S-900B Tacky Clear Booth Coat, 71900 GageSol Coating), 3 and 4 (Chemico 7915 - straight or 50/50 dilution) (scrape and/or brush and rinse with water, {5

		K powerwash, if needed})
Spot repair booths	Paint Shop	3 (including tack cloths), 4 (Glass Advantage)
Final Repair booth	General Assembly	4 Glass advantage wipes

E. Cleaning of spray booth equipment (63.3094 (c)(1)(vi))

LDT will use one or more of the following for the cleaning of spray booth equipment:

1. Use of covers on equipment (disposable or reusable).
2. Use of parts cleaners (off-line submersion cleaning).
3. Use of spray-on masking or other protective coatings.
4. Use of low-HAP or no-HAP content cleaners.
5. Controlled access to cleaning solvents.

The following table identifies the spray booth equipment and the techniques in use.

Operation	Location	Technique
Basecoat booth robots and applicators	Paint Shop	1, 2, 4 (Gage Hydropurge 36611 / RO mix, Isopropyl Wipes)
Clearcoat booth robots and applicators	Paint Shop	1, 2, 4 (Isopropyl Wipes, Equipment Cleaner CN38183)
Clearcoat conveyor inside booth	Paint Shop	4 (S-553 Cleaning Material, when needed)
Spot repair booth applicators	Paint Shop	4 (Gage Hydropurge 36611 / RO mix, Equipment Cleaner CN38183)
Final Repair booth applicators	General Assembly	4 (Gage Hydropurge 36611 / RO mix, or Equipment Cleaner CN38183)

F. Cleaning of external spray booth areas (63.3094 (c)(1)(vii)

LDT will use one or more of the following for the cleaning of external spray booth areas:

1. Use of removable floor coverings (paper, foil, plastic, or similar type of material).

2. Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application.
3. Use of shoe cleaners to eliminate coating track-out from spray booths.
4. Use of booties or shoe wraps.
5. Use of low-HAP or no-HAP content cleaners.
6. Controlled access to cleaning solvents.

The following table identifies the area and the techniques in use.

Area	Location	Technique
Cleanroom	Paint Shop	2, 5 (Chemico 7915 (diluted), Glass Cleaner)
Spot Repair Booth	Paint Shop	1, 5 (Multipurpose Cleaner)
Final Repair Booth	General Assembly	1, 5

G. Housekeeping measures not addressed elsewhere in the plan (63.3094 (c) (1) (viii))

LDT will use one or more of the following for housekeeping measures not addressed elsewhere in the plan:

1. Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use.
2. Storing new and used solvents in closed containers.
3. Transferring of solvents in a manner to minimize the risk of spills.

The following table identifies the area and the techniques in use.

Activity / Cleaning Solvent	Organic HAP Containing	Location	Technique
General Floors – water or Chemico 7915, Paint Shop Foyer – Vinegar for salt in winter	No	Paint Shop	Not applicable
General Floors – water or Chemico 6917E, GA Foyer – Vinegar for salt in winter	No	GA, Body Shop, Stamping	Not applicable

IV. Plan Communication

The requirements of this work plan will be communicated to LDT employees and contract employees as appropriate to ensure that the elements of the work plan are properly implemented.

Methods of communication include:

1. Work Instructions/Task Instruction Sheets
2. New hire environmental onboarding training
3. Hazardous Materials Communications (Chemical Approvals)
4. Team Meetings
5. Employee Instruction/Coaching
6. Work Plans
7. VOC Communication Meetings
8. Other communications, such as emails and newsletters

V. Inspection Requirements / Corrective Action

LDT environmental engineers will perform a review once per Title V deviation reporting period or annually at a minimum for those plants without a Title V permit to ensure that the elements of the work plan are properly implemented. The "Work Practice Plan Appendix" will be used to document the review and results.

VI. Plan Updates

This work practice plan will be reviewed once during each Title V deviation reporting period, or annually, and updated as appropriate by the LDT environmental engineer. Every review must be documented regardless of updates to the plan. Reviews will be documented in section XII.

VIII. Title V Permit (63.3094 (e))

This work practice plan is not incorporated into LDT Title V ROP. Revisions to the plan will not constitute revisions to LDT's Title V ROP. Nonconformances to this work practice plan do not constitute Title V ROP deviations.

IX. Plan Retention (63.3094 (f))

Copies of the current work practice plans, as well as plans developed within the preceding 5 years must be available on-site for inspection and copying by the permitting authority.

X. Definitions

Closed: A container is "closed" if its top, lid, hatch, or other opening mechanism is in the closed position. Containers requiring pumps or other devices inserted into the container are considered "closed" if the pump or other device is securely installed.

Storage: A container used for the storage of a HAP containing material is one in which no mixing or conveyance takes place. Examples may include totes, drums, and buckets.

HAP materials: refers to organic HAP-containing coatings, thinners, cleaning materials, and waste materials, as applicable pursuant to 40 CFR Part 63 Subpart IIII.

XI. Document Responsibilities

Environmental Engineer or Designee: Controls work practice plan document and conducts plan reviews.

Site Personnel: Utilizes appropriate work practices identified in the work practice plan and supports plan reviews.

XII. Plan Review

Document plan reviews below per Section VI:

Review Date:	Document Reviewer:	Revisions/Review Comments:
5/26/2016	Jeff Hummel	Revised to reflect updates to corporate WPP template
2/10/2017	Jeff Hummel	No Revisions
8/17/2017	Brian Borzenski	No Revisions
3/13/2018	Brian Borzenski	Added references to new WB purge materials
10/16/2018	Brian Borzenski	Plan review; removed references to old WB purge materials
1/7/2019	Brian Borzenski	Plan review for ROP Renewal Application
9/8/2019	Brian Borzenski	Plan review; updated booth coating material name
3/7/2020	Brian Borzenski	Plan review
12/21/2020	Brian Borzenski	Plan review
6/29/2021	Brian Borzenski	Plan review and appropriate updates
12/28/2021	Brian Borzenski	Plan review
6/29/2022	Patrick Doyle	Plan review and appropriate updates
12/21/2022	Brent Cousino	Plan review; no revisions
3/5/2023	Patrick Doyle	Plan review; no revisions
6/1/2023	Patrick Doyle	Plan review; no revisions
3/22/2024	Patrick Doyle	Updated Waterborne Purge from 36600 to 36611
9/10/2024	Patrick Doyle	Plan review; no revisions

Revision History

Revision	Date
Semiannual review performed.	3/22/2024
Semiannual review performed.	12/22/2023
Semiannual review performed.	6/1/2023
Semiannual review performed	12/21/2022

Semiannual review performed. Replaced AP3312 with Gage Hydropurge 36600	6/29/2022
Semiannual review performed.	12/28/2021
Semiannual review performed. Added Aquastrip 609 to the flushing of coating systems section; removed Aromatic 100; added “New hire environmental onboarding training“ to the methods of communication.	6/29/2021
Semiannual review performed.	12/21/2020
Semiannual review performed.	3/7/2020
Semiannual review performed. Removed Gage S-907; added 71900 GageSol Coating	9-8-2019
Updates for ROP Renewal Application, Added Gage S-900B	1-7-2019
Semiannual review performed.	10-16-2018
Semiannual review performed.	3-13-2018
Semiannual review performed.	8-17-2017
Semiannual review performed.	2/10/2017
Revised to reflect updates to corporate WPP template	5-26-2016
Section II.B.7 – Added SWPP, Deleted inactive Cyclosol #53 from Section F table.	2-9-2016
No Update needed.	9-8-2015
Semiannual review: Removed Purge Solvents CN31920 and CN31921, deleted CN38083, updated CC booth wall cleaning information (added brush for 7915 and powerwash), under Section 8 added Foyer cleaning and High volume blow off area information (based on interview with Team Industries, Steve Montgomery), add CC conveyor cleaning material (S-553)	9-16-2014
Semiannual review with Steve Montgomery: no significant updates needed.	2-27-2014
Added Purge solvent CN31922.	7-24-13

HAP Containing Material Identification Process for Applicability to AutoMACT Work Practice Plan Requirements

Rule Analysis and Comment

What organic HAP emissions must be covered by the WWP? Rule 63.3094 (b) says:

(b) You must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations for which emission limits are established under § 63.3090(a) through (d) or § 63.3091(a) through (d).

What are coatings?

Coating means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, caulks, inks, adhesives, primers, deadeners, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances are not considered coatings for the purposes of this subpart.

What are thinners?

Thinner means an organic solvent that is added to a coating after the coating is received from the supplier.

What are Cleaning Materials?

Cleaning material means a solvent used to remove contaminants and other materials such as dirt, grease, oil, and dried (e.g., depainting) or wet coating from a substrate before or after coating application; or from equipment associated with a coating operation, such as spray booths, spray guns, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

What are Waste Materials? (not defined in AutoMact)

What are coating operations for which emission limits are established under § 63.3090(a) through (d) or § 63.3091(a) through (d)?

(a - b) electrodeposition primer, primer-surfacer, topcoat, final repair, glass bonding primer and glass bonding adhesive operations plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating operations added to the affected source pursuant to § 63.3082

(c) adhesive and sealer materials

(d) deadener materials

What is a Coating Operation?

§63.3176: Coating operation means equipment used to apply coating to a substrate (coating application) and to dry or cure the coating after application. A single coating operation always includes at least the point at which a coating is applied and all subsequent points in the affected source where organic HAP emissions from that coating occur. There may be multiple coating operations in an affected source. **Coating application with hand-held nonrefillable aerosol containers, touchup bottles, touchup markers, marking pens, or pinstriping equipment is not a coating operation for the purposes of this subpart.** The application of temporary materials such as protective oils and "travel waxes" that are designed to be removed from the vehicle before it is delivered to a retail purchaser is not a coating operation for the purposes of this subpart.

Summary

Materials Subject to WPP - ELPO, Primer Surfacer, Topcoat, Final Repair, Glass Bonding Primer / Adhesive, Deadener, Sealers, Adhesives, Cleaning Materials (Solvents for substrate wiping before or after coating; or equipment cleaning)

Review Methodology

1. As part of CCC process, Environmental reviews materials subject to the WPP requirements for HAP content.
2. HAP content is determined by review of ingredients list against the HAP list provided by corporate environmental.
3. Materials subject to WPP are added to plan during semiannual review.
4. Review Documentation is maintained in environmental files.
5. Environmental forwards HAP information to GMR2 for inclusion in FG-MACT calculations.

MACT WORK PRACTICE PLAN APPENDIX

Part (a), Section 1: Identifying Organic HAP Materials

Lansing Delta Township

Part (a), Section 1, must be completed and/or reviewed at least once per Title V deviation reporting period (e.g., semi-annually, quarterly) and retained as a record to document compliance with the regulation.

STEPS TO COMPLETING PART (a), Section 1:

Evaluate materials for presence of organic HAPs. The evaluation must include all paints, solvents, adhesives, sealers, and coating operation cleaning materials (e.g., booth cleaners, grate cleaners).
(e.g. to perform the evaluation, site can use SDS and GMR2 as resources)

) Record the GM Product ID, the product name, and the application category in the space provided. It is recommended to include the HAP content and any other pertinent information in the Comment column.

. Complete "Review Completed By" and "Review Date" sections at bottom of page.

HAP Material GM Product ID	HAP Material Product Name	Application Category	Comment
SH# 1645846	063CW0104 DSX 1550 Blend	Paint Additive	Total HAP Content: 10%
30052782	262EW0001 PE1385 Paste EOLR Color Control Additive	Final Repair	Total HAP Content: 6%
40013829	31947 GagePurge	Cleaning Material	Total HAP Content: 45.5%
30093336	38183 Equipment Cleaner	Cleaning Material	Total HAP Content: 3%
40017514	71900 GageSol Coating	Other--	Total HAP Content: 3% Paint booth coating New name in 2019
356321	Aromatic 100	Cleaning Material	Total HAP Content: 3.2% GA Repair
223283	Denatured Alcohol	Cleaning Material	Total HAP Content: 14.25% Body wiping - in CMM room and weld integrity booth prior to testing. Replaced Brentagg Aromatic 100; LRS Die Room Q10 and N1 usage is exempt
40024737	Basecoat: A369AT303 Sharkskin Met	Topcoat	
	Basecoat: E369AT303 Sharkskin Met	Topcoat	
318396	Kent High-Tech Seam Sealer Clear P10200	Sealer / Adhesive	Total HAP Content: 30.9% Squeeze Tube
234453	Kent High-Tech Seam Sealer Clear P10195	Sealer / Adhesive	Total HAP Content: 45% Caulk Tube
348457	Kent High-Tech Clear Pump Grade Clear Seam Sealer P10567	Sealer / Adhesive	Total HAP Content: 45% Can
30098817	MIBK GageThin 10221	Cleaning Material	Total HAP Content: 100% Used for CC recirc system cleaning
308035	Kent Quick Seal Black P10556	Sealer / Adhesive	Total HAP Content: 8%
40008158	R10CG062T UREGLOSS CW	Clearcoat	Total HAP Content: 4.8% New in 2018
40019418	R10RG034A Cherry Pop CC	Clearcoat	Total HAP Content: 5.4% New in 2021
339333	S-900B Tacky, Clear Booth Coat	Other--	Total HAP Content: 3% Paint booth coating New in 2018; renamed in 2019
1182343	U53CG073 Low Bake Catalyst	Final Repair	Total HAP Content: 0.5% aka Cymel 325 Resin
1182362	VP126 Flash Fill UV Primer Surfacer	Final Repair	Total HAP Content: 0.1% Removed Oct 2018 - MEK is not a HAP Added back Dec 21 because ethylbenzene now listed on 5/27/21 SDS

HAP Material GM Product ID	HAP Material Product Name	Application Category	Comment
102562	Xylene	Cleaning Material	Total HAP Content: 100% Used for CC recirc system cleaning.
	Items below this line are applicable, but do not have recent purchase records.		
30000991	31922 GagePurge	CC Purge Solvent	Total HAP Content: 12% Also the major component of Reclaimed Purge Solvent Replaced by 31947 GagePurge
40000988 / 1187373	Super Degreaser from CRC	Other--	Total HAP Content: 4% Used on headliners in Trim 4; also used for exempt purposes throughout the plant and at mobile truck repair areas
1187449	Super-Fast Repair Adhesive PN 04747 from 3M	Sealer / Adhesive	Total HAP Content: 2%
30001339	597WW0137 PW0137 IN RV5800	Paint Additive	Total HAP Content: 0.15% Color tint additive
40002849	Dynatex 49412 Black Brush-On Electrical Tape	Final Repair	Total HAP Content: 31.05% Used to repair vehicle wiring
SH# 385041	Tite-R-Bond 2287A	Sealer / Adhesive	Total HAP Content: 3% Has not been used in several years. Still in flam cabinet @ GA M14

Note 1 The organic HAP content of the materials listed above were obtained from SDS information and GMR2 HAP reports using 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens (and suspected carcinogens), as specified in 29 CFR 1910.1200(d)(4) [as listed as known carcinogen by NTP, IARC or OSHA] and at 1.0 percent by mass or more for other organic HAP compounds.

Review Completed By: Patrick Doyle
Review Date: 6/24/24

MACT WORK PRACTICE PLAN APPENDIX

Part (a), Section 2: Identifying HAP Material Locations

Lansing Delta Township

Part (b) must be completed at least once per Title V deviation reporting period (e.g., semi-annually, quarterly) and retained as a record to document compliance with the regulation.

STEPS TO COMPLETING PART (a), Section 2:

1) Identify the "building" and "bay locations" where storing, mixing, and conveying of HAP materials takes place (used in and waste materials generated by), and record in the space provided. Group into categories by common material identifiers and handling methods.
2) Identify the "conveyance method" for each HAP material category, and record in the space provided. (Note: The "Conveyance Method" column has a "drop down menu" of choices.)
3) Identify the process owner job position for each HAP material, and record in the space provided.

HAP Material Category	Building	Bay	Conveyance Method 40 CFR §63.3094 (b)(3)	Process Owner	Comment
Seal./Adh. - (High Tech Clear Seam Sealer P10200, Quick Seal Black P10556, High Tech Clear Seam Sealer P10195)					
Storing	Paint Sealer Line	C-21, C-22, C-23	Not Applicable	Paint Tech Support	no issues
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Tech Support	n/a
Conveying	Paint Sealer Line	C-21, C-22, C-23	Manual	Paint Tech Support	no issues
Storing	Paint Spot Repair	Spot Repair Booths, F21	Not Applicable	Paint Group Leader	no issues
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Group Leader	n/a
Conveying	Paint Spot Repair	Spot Repair Booths	Manual	Paint Group Leader	no issues
Storing	GA Water Test Booth	H-5	Not Applicable	GA Group Leader	no issues
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	n/a
Conveying	GA Water Test Booth	H-5	Manual	GA Group Leader	no issues
Storing	GA Heavy repair	J-11	Not Applicable	GA Group Leader	no issues
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	n/a
Conveying	GA Heavy repair	J-11	Manual	GA Group Leader	no issues
Storing	GA	L-11, F-19, G-11, M-14	Not Applicable	GA Group Leader	no issues
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	n/a
Conveying	GA	L-11	Manual	GA Group Leader	no issues
Storing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	no issues
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Group Leader	n/a
Conveying	GA Paint Hospital	L 8-9	Manual	Paint Group Leader	no issues
Seal./Adh. - Tite R bond 2287A					
Storing	Chem. POU	M-14	Not Applicable	GA Group Leader	no issues
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	n/a
Conveying	GA	GA	Manual	GA Group Leader	no issues
Clear Coat Paints, Paint Additives					
Storing	Paint (Mix Room)	F.1-2 - G.1-3	Not Applicable	Paint Tech Support	no issues
Mixing	Paint (Mix Room)	F.1-2 - G.1-3	Not Applicable	Paint Tech Support	no issues
Conveying	Paint	D - F.2, 4 - 7.3 TC BOOTH	Pumps, hard piping	Paint Tech Support	no issues
Storing	Paint Spot Repair	F-25 16'	Not Applicable	Paint Group Leader	no issues
Mixing	Paint Spot Repair	F-25 16'	Not Applicable	Paint Group Leader	no issues
Conveying	Paint Spot Repair	F-25 16'	Manual	Paint Group Leader	no issues
Storing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	no issues
Mixing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	no issues
Conveying	GA Paint Hospital	L 8-9	Manual	Paint Group Leader	no issues
Seal./Adh. - Super-Fast Repair Adhesive PN 04747					
Storing	Paint Spot Repair	16' D19 and Topcoat Review TRN06R	Not Applicable	Paint Group Leader	no issues
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Group Leader	n/a
Conveying	Paint Spot Repair	16' D19 and Topcoat Review TRN06R	Manual	Paint Group Leader	no issues
Storing	GA	G-4	Not Applicable	GA Group Leader	no issues

HAP Material Category	Building	Bay	Conveyance Method 40 CFR §63.3094 (b)(3)	Process Owner	Comment
Mixing	Not Applicable	Not Applicable	Not Applicable	GA Group Leader	n/a
Conveying	GA - GCA or Repair areas	H-5 to K-12	Manual	GA Group Leader	no issues
CC Purge Solvent- 31947 GagePurge Purge Solvent & 38183 Equipment Cleaner					
Storing	Paint (Mix Room)	0' G-1	Not Applicable	Paint Tech Support	no issues
Storing	Paint	16' CC BOOTHS, E15	Not Applicable	Paint Tech Support	no issues
Mixing	Paint (Mix Room)	G-1	Not Applicable	Paint Tech Support	no issues
Conveying	Paint (Mix Room)	0' G-1	Manual	Paint Tech Support	no issues
Conveying	Paint	16' CC BOOTHS, E15	Manual	Paint Tech Support	no issues
Conveying	Paint	0' D - F.2, 4 - 7.3	Pumps, hard piping	Paint Tech Support	no issues
Storing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	no issues
Mixing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	no issues
Conveying	GA Paint Hospital	L 8-9	Manual	Paint Group Leader	no issues
Repair Paint Additives - U53CG073 Low Bake Catalyst, Color Control Additive					
Storing	Paint Spot Repair	F-25 16'	Not Applicable	Paint Group Leader	no issues
Mixing	Paint Spot Repair	F-25 16'	Not Applicable	Paint Group Leader	no issues
Conveying	Paint Spot Repair	F-25 16'	Manual	Paint Group Leader	no issues
					n/a
Storing	Paint (Mix Room)	G-1	Not Applicable	Paint Tech Support	no issues
Storing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	no issues
Mixing	GA Paint Hospital	L 8-9	Not Applicable	Paint Group Leader	no issues
Conveying	GA Paint Hospital	L 8-9	Manual	Paint Group Leader	no issues
Waste Materials - Waste Purge Thinner Tank (Reclaim purge solvent)					
Storing	Paint (Mix Room)	G-1	Not Applicable	Paint Tech Support	no issues
Mixing	Paint (Mix Room)	G-1	Not Applicable	Paint Tech Support	no issues
Conveying	Paint (Mix Room)	D-8 - G-1	Pumps, hard piping	Paint Tech Support	no issues
Waste Materials - Waste Paints and Thinners					
Storing	Paint 0' & 16'	G-1, G-2, D-9, E-9, F-25	Not Applicable	Paint Tech Support	no issues
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Tech Support	n/a
Conveying	Paint 0' & 16'	Pipes	Manual	Paint Tech Support	no issues
Storing	GA Paint Hospital	L-9	Not Applicable	Paint Group Leader	no issues
Mixing	Not Applicable	Not Applicable	Not Applicable	Paint Group Leader	n/a
Conveying	GA Paint Hospital	L-9	Manual	Paint Group Leader	no issues
Equipment Cleaning Agent - CC recirculation system (GagePurge 31947, MIBK and Xylene), S-900B/71900 GageSol Coating & 38183 Equipment Cleaner					
Storing	Paint (Mix Room)	F-1, F-2	Not Applicable	Paint Tech Support	no issues
Storing	Paint (Mix Room)	0' D-12	Not Applicable	Paint Tech Support	no issues
Mixing	Paint (Mix Room)	G-3	Not Applicable	Paint Tech Support	no issues
Conveying	Paint	D - F.2, 4 - 7.3	Pumps, hard piping	Paint Tech Support	no issues
Equipment Cleaning Agent					
Storing	GA Paint Hospital	L-9	Not Applicable	Paint Group Leader	no issues
Mixing	GA Paint Hospital	L-9	Not Applicable	Paint Group Leader	no issues
Conveying	GA Paint Hospital	L-9	Manual	Paint Group Leader	no issues
Cleaning Agent - Denatured Alcohol Solvent					
Storing	Body Shop CMM		Not Applicable	Group Leader	no issues
Mixing	Body Shop CMM		Not Applicable	Group Leader	n/a
Conveying	Body Shop CMM		Manual	Group Leader	no issues
Super Degreaser					
Storing	GA	F-19, F-25, J-11, L-11, M-14, U-16, H-15, H-5, L-16	Not Applicable	Group Leader	no issues
Mixing	GA	Not Applicable	Not Applicable	Group Leader	n/a
Conveying	GA	F-19, F-25, J-11, L-11, M-14, U-16, H-15, H-5, L-16	Manual	Group Leader	no issues

Review Completed By:	**Patrick Doyle**
Review Date:	**6/24/24**

MACT WORK PRACTICE PLAN APPENDIX

Part (b): Storage, Mixing, and Conveying HAP Materials

Lansing Delta Township

Part (b) must be completed at least once per Title V deviation reporting period (e.g., semi-annually, quarterly) and retained as a record to document compliance with the regulation.

ITEM # b.1 40 CFR §63.3094 (b)(1)

TOPIC: Storing HAP materials.

ACTIONS:

1. Conduct a visual inspection of each HAP material storage area identified in "Part (a), Section 2."
2. Confirm that containers are kept closed when not in use.
3. Replace cover if any are found open and note occurrence(s) in the "Comments/Validation" column.
4. Communicate proper storage procedures, as appropriate.
5. Enter inspection date for each HAP category in box under appropriate inspection period.

NOTE: If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all related follow up inspections.

HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/ Validation	Building/ Area	Storage Location
Seal./Adh.--Body Shop	6/7/2019	9/9/2019	3/10/2020	12/21/2020	6/28/2021	12/18/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Body Shop	Plant Floor
ELPO	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Paint Shop	ELPO Tanks / IBCs
Seal./Adh.--Paint Shop	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Plant Floor
Deadener (GA Foam)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	GA	Plant Floor
Primer Surfacer	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Paint Shop	Powder Prime Storage
Base Coat	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair
Clear Coat	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair
Paint Additives	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair
Thinners/Reducers	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair
Purge Solvents	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room
Windshield Installation	6/9/2019	9/8/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/24/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		GA	Plant Floor
Final Repair	6/10/2019	9/8/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/24/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		GA	Final Repair Kitchen
Cleaning Agents	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop / GA	Plant Floor
Reclaimed Purge	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room Tank
Waste Paints and Thinners	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/29/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop / GA	Mix Room / Spot Repair / Final Repair

ITEM # b.2 40 CFR §63.3094 (b)(2)

TOPIC: Minimizing HAP material spills.

ACTIONS:

1. Conduct a inspection of each HAP material storage area identified in "Part (a), Section 2."
2. Confirm that HAP materials are stored according to WPP.
3. Enter inspection date for each HAP category in box under appropriate inspection period.

NOTE: If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all related follow up inspections.

Location	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/ Validation
Seal./Adh.--Body Shop	6/7/2019	9/9/2019	3/10/2020	12/21/2020	6/28/2021	12/18/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
ELPO	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Seal./Adh.--Paint Shop	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
Deadener (GA Foam)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Primer Surfacer	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
Base Coat	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
Clear Coat	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
Paint Additives	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
Thinners/Reducers	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
Purge Solvents	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
Windshield Installation	6/9/2019	9/8/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/24/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
Final Repair	6/10/2019	9/8/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/24/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
Cleaning Agents	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
Reclaimed Purge	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			
Waste Paints and Thinners	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/29/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			

ITEM # b.3 40 CFR §63.3094 (b)(3)

TOPIC: HAP material conveyance.

ACTIONS:

1. Confirm that HAP materials are conveyed according to WPP.
2. List any conveyance system failures in the "Comments / System Failure Details" column adjacent to the applicable HAP material category. If there were no failures in the applicable period, please indicate "none."
3. Enter inspection date for each HAP category in box under appropriate inspection period.

HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments / System Failure Details *(i.e., date, nature of failure, corrective action)*	Building	Conveyance Location
Seal./Adh.--Body Shop	6/7/2019	9/9/2019	3/10/2020	12/21/2020	6/28/2021	12/18/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Body Shop	Plant Floor
ELPO	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Paint Shop	ELPO Tanks / IBCs / Piping
Seal./Adh.--Paint Shop	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Plant Floor
Deadener (GA Foam)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	GA	Plant Floor
Primer Surfacer	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Paint Shop	Powder Prime Storage / Prime Booth / Piping
Base Coat	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair / Piping
Clear Coat	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair / Piping
Paint Additives	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair
Thinners/Reducers	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair
Purge Solvents	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Piping
Windshield Installation	6/9/2019	9/8/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/24/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		GA	Plant Floor
Final Repair	6/10/2019	9/8/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/24/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		GA	Final Repair Kitchen
Cleaning Agents	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop / GA	Plant Floor
Reclaimed Purge	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Tank / Piping
Waste Paints and Thinners	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/29/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop / GA	Mix Room / Spot Repair / Final Repair

TOPIC: Keeping mixing vessels closed, unless adding or removing material.

ACTIONS:

1. Conduct a visual inspection of each HAP material mixing area identified

in "Part (a), Section 2."
2. Confirm that vessels are kept closed, unless adding or removing material.
3. Close vessel if any are found open and note occurrence(s) in the "Comments/Validation" column.
4. Re-instruct employees regarding proper mixing vessel procedures, as appropriate.
5. Enter inspection date for each HAP category in box under appropriate inspection period.

NOTE: If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all related follow up inspections.

ITEM # b.4 40 CFR §63.3094 (b)(4)

HAP Material Location	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments / System Failure Details *(i.e., date, nature of failure, corrective action)*	Comments/ Validation	General Location
Seal./Adh.--Body Shop	6/7/2019	9/9/2019	3/10/2020	12/21/2020	6/28/2021	12/18/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Body Shop	Plant Floor
ELPO	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Paint Shop	ELPO Tanks / IBCs
Seal./Adh.--Paint Shop	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Plant Floor
Deadener (GA Foam)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	GA	Plant Floor
Primer Surfacer	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Paint Shop	Powder Prime Storage
Base Coat	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair
Clear Coat	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair
Paint Additives	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair
Thinners/Reducers	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room / Spot Repair / Final Repair
Purge Solvents	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room
Windshield Installation	6/9/2019	9/8/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/24/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		GA	Plant Floor
Final Repair	6/10/2019	9/8/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/24/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		GA	Final Repair Kitchen
Cleaning Agents	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop / GA	Plant Floor
Reclaimed Purge	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop	Mix Room Tank
Waste Paints and Thinners	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/29/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024		Paint Shop / GA	Mix Room / Spot Repair / Final Repair

TOPIC: Minimizing HAP emissions during cleaning of storage, mixing, and conveying equipment.

ACTIONS:

1. Conduct a visual inspection of a cleaning activity for a HAP material storage container, mixing and conveying equipment .
2. Confirm that HAP emissions were minimized during the cleaning process.
3. If no such cleaning activities took place during the applicable inspection period, please enter "none" in the "Comments/Validation" column.
4. Re-instruct employees regarding proper cleaning procedures, as appropriate.
5. Enter inspection date for each HAP category in box under appropriate inspection period.

NOTE: If corrective action is required to address a plan nonconformance, provide detail of the action in the "Comments/Validation" column and validate effectiveness. Include dates of all related follow up inspections.

ITEM # b.5 40 CFR §63.3094 (b)(5)

HAP Material Category	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	ENTER INSPECTION DATE BELOW:	Comments/Validation
Seal./Adh.--Body Shop	6/7/2019	9/9/2019	3/10/2020	12/21/2020	6/28/2021	12/18/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
ELPO	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Seal./Adh.--Paint Shop	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
Deadener (GA Foam)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Primer Surfacer	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Base Coat	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
Clear Coat	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
Paint Additives	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
Thinners/Reducers	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
Purge Solvents	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
Windshield Installation	6/9/2019	9/8/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/24/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
Final Repair	6/10/2019	9/8/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/24/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
Cleaning Agents	6/10/2019	9/9/2019	3/10/2020	12/21/2020	6/29/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
Reclaimed Purge	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/30/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none
Waste Paints and Thinners	6/10/2019	9/9/2019	3/2/2020	12/21/2020	6/29/2021	12/23/2021	6/27/2022	12/21/2022	6/1/2023	12/22/2023	6/24/2024			none

Inspection Completed By: Patrick Doyle
Inspection Date: 6/24/24

MACT WORK PRACTICE PLAN APPENDIX
Part (c): Cleaning and Purging of Coating Equipment
Lansing Delta Township

The Work Practice Plan must be reviewed against Part (c) at least once per Title V deviation reporting period (e.g., semi-annually, quarterly). The Work Practice Plan review must be retained as a record to document compliance with the regulation.

STEPS TO COMPLETING PART (c):

1) Evaluate site practices for ITEMS # **c.1.i** through **c.1.viii** are properly identified in the Work Practice Plan.

2) At least one method for minimizing HAP emissions must be identified for each ITEM in the WPP.

Note: The checklist for "Part b.5" validates how emissions are minimized during the cleaning of mixing and conveying equipment.

ITEM # c.1.i 40 CFR §63.3094 (c)(1)(i)	**Vehicle body wipe**
	Use of solvent-moistened wipes
	Keeping solvent containers closed when not in use
	Keeping wipe disposal/recovery containers closed when not in use
	Use of tack-wipes
	Use of solvents containing <1% HAP by weight
ITEM # c.1.ii 40 CFR §63.3094 (c)(1)(ii)	**Coating line purging emissions**
	Air/solvent push-out
	Capture/reclaim or recovery of purge mat'ls
	Block painting to maximum feasible amount
	Use of low-HAP or no-HAP solvents
ITEM # c.1.iii 40 CFR §63.3094 (c)(1)(iii)	**Flushing of coating systems (system clean out)**
	Keeping solvent tanks closed
	Recovering and recycling solvents
	Keeping recovered/recycled solvent tanks closed
	Use of low-HAP or no-HAP solvents
ITEM # c.1.iv 40 CFR §63.3094 (c)(1)(iv)	**Cleaning of spray booth grates**
	Controlled burn off
	Rinsing with high pressure water
	Use of spray on masking or other liquid masking
	Use of low-HAP or no-HAP cleaners
ITEM # c.1.v 40 CFR §63.3094 (c)(1)(v)	**Cleaning of spray booth walls**
	Use of masking materials (paper, plastic, etc.)
	Use of spray on masking
	Use of rags and manual wipes instead of spray application
	Use of low-HAP or no-HAP cleaners
	Controlled access to cleaning solvents

ITEM # c.1.vi 40 CFR §63.3094 (c)(1)(vi)	**Cleaning of spray booth equipment (robots, hoses, etc.)**
	Use of covers on equipment
	Use of parts cleaners (off-line submersion cleaning)
	Use of spray on masking or other protective coatings
	Use of low-HAP or no-HAP cleaners
	Controlled access to cleaning solvents
ITEM # c.1.vii 40 CFR §63.3094 (c)(1)(vii)	**Cleaning of external spray booth areas**
	Use of removable floor coverings
	Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application
	Use of shoe cleaners to eliminate coating track-out from booths
	Use of booties or shoe wraps
	Use of low-HAP or no-HAP cleaners
	Controlled access to cleaning solvents
ITEM # c.1.viii 40 CFR §63.3094 (c)(1)(viii)	**Housekeeping measures not addressed above**
	Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, etc) in covered containers when not in use
	Storing new and used solvents in closed containers
	Transferring of solvents in a manner to minimize the risk of spills

Review Completed By:	**Patrick Doyle**
Review Date:	**6/24/24**

LANSING DELTA TOWNSHIP ASSEMBLY (LDT)

OPERATION & MAINTENANCE PLAN – SEALERS & ADHESIVES

Version Date: September 30, 2024

GM LDT is required to develop, maintain and implement an Operation and Maintenance Plan (O & M Plan) for EU-Sealers & Adhesives. The details of this requirement are described in the site's Renewable Operating Permit's EU-Sealers & Adhesives, S.C. III.2 and in Appendix 4-1:

2. The permittee shall maintain and implement an Operation and Maintenance Plan (O & M Plan) for EU-SEALERS & ADHESIVES. The O & M Plan shall contain the minimum requirements as outlined in Appendix 4-1. The O & M Plan shall be updated as necessary to reflect changes in equipment and monitoring, to implement corrective to the AQD District Supervisor for review and approval. All records and activities associated with the O & M Plan shall be made available to the Department upon request.[2] **(R 336.1224, R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21 (c) and (d))**

Appendix 4-1. Recordkeeping

The permittee shall use the following approved formats and procedures for the recordkeeping requirements referenced in EU-SEALERS & ADHESIVES. Alternative formats must be approved by the AQD District Supervisor.

General – Keep records of maintenance inspections which include the dates, results of the inspections and the dates and reasons for repairs if made. The following items shall be inspected for each respective add-on control device used to demonstrate compliance with applicable particulate emission limits.

Regenerative Thermal Oxidizers

- Validation of thermocouple accuracy or recalibration of each thermocouple a minimum of once every 12 months. The thermocouple can be replaced in lieu of validation.
- Perform a heat exchange/heat transfer media inspection a minimum of once every 18 months. *
- Perform an inspection of the valve seals condition and verify valve timing/synchronization a minimum of once every 18 months. *

* The requirement to address this issue is satisfied if a performance test (*i.e.,* stack test) has been performed on the control device within the prior 18-month period.

In order to comply with the O & M Plan requirement, GM LDT utilizes the plant's MAXIMO asset management software solution to schedule and manage the scheduled preventive maintenance (PM) tasks to be performed on the Prime RTO that controls the particulate emissions produced from the guidecoat curing oven. Table 1 lists the MAXIMO PM tasks that are scheduled to be performed on the Prime RTO.

Table 1

MAXIMO PM #	MAXIMO Job Plan #	PM Task Description	Frequency
PM1016	JP0104	RTO PRIME TOWER DAMPER SWITCHING TIME INTERVAL	Every 26 weeks
PM10859	JP0117	RTO PRIME THERMOCOUPLE ANNUAL VALIDATION	Every 52 weeks
PM10860	JP0095	RTO PRIME COMBUSTION CHAMBER VISUAL INSPECTION SEMI ANNUAL	Every 26 weeks
PM10861	JP3112	RTO PRIME GAS TRAIN INSPECTION	Every 26 weeks
PM10862	JP3083	RTO PRIME INSPECT & LUBE	Every 13 weeks

Additionally, the GM LDT Environmental Engineer maintains a log of Prime RTO maintenance activities that have been completed. The log is updated on a monthly basis.

Abatement system malfunctions are recorded in GM's Reliance computer-based information management system. Corrective actions associated with Prime RTO malfunctions are also managed in the Reliance system.