

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

EFFECTIVE DATE: August 10, 2022

ISSUED TO

**Plasan Carbon Composites
and
Plasan North America**

State Registration Number (SRN): P0374

LOCATED AT

3195 Wilson Drive, Walker, Kent County, Michigan 49534
3111 North Wilson Court NW, Suite A, Walker, Michigan 49534

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-P0374-2022

Expiration Date: August 10, 2027

Administratively Complete ROP Renewal Application
Due Between February 10, 2026 and February 10, 2027

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-P0374-2022

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

Michigan Department of Environment, Great Lakes, and Energy

Heidi Hollenbach, Grand Rapids District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).² **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

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

The grading of visible emissions shall be determined in accordance with Rule 303.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
 - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; “based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete.” The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit Shield

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

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

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

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

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

Reopenings

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

Renewals

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

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

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

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

DESCRIPTION

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

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer (RTO) on EUPAINTLINE-1. EUPAINTLINE-1 is constructed with a damper that allows emissions to be exhausted to the RTO or directly to a stack when RTO is off.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each Individual HAP	9.9 tpy ²	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SC VI.2	R 336.1205(1)
2. Aggregate HAPs	24.9 tpy ²	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SC VI.2	R 336.1205(1)
3. Styrene (CAS# 100-42-5)	2.0 tpy ¹	12-month rolling time period as determined at the end of each calendar month	SOURCE-WIDE	SC VI.3	R 336.1225(2)

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))**

- The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.² **(R 336.1205(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 last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205(1))**
2. The permittee shall keep the following information on a monthly basis:
 - a. Gallons or pounds of each HAP containing material used.
 - b. Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c. HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
 - d. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
 - e. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and 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(1))**

3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period styrene emission calculation records, as required by SC I.3. The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.¹ **(R 336.1225)**

See Appendix 7

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

Footnotes:

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

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

C. EMISSION UNIT SPECIAL CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCARBONMOLD	Seven (7) oil-heated molding presses with a 3.2 MMBTU/hr natural gas-fired boiler to heat the oil, two (2) electrically heated autoclaves, and one (1) natural gas-fired autoclave.	08-12-2013	NA
EUPULTRUSION	Single pultrusion line in which reinforcing fiber materials are pulled through a resin bath and then a series of preform plates which shape the coated fibers into the desired profile. The coated fibers are then drawn through a heated die which initiates an exothermic reaction and polymerizes the thermosetting resins to produce composite rods and tubes. The finished product is then cut to desired lengths with a wet saw.	02-01-2016 10-04-2018 03-04-2020	NA
EUADHESIVE	Robotic bonding process in open plant area.	08-12-2013	NA
EUPAINTLINE-1	A conveyORIZED paint line consisting of a five-stage wash line with a natural gas-fired dry off oven, a cool down zone, a two-section dry filter booth with robotic and manual paint application, a convection heat cure oven, and a natural gas-fired cure oven. The two-section dry filter booth, flash zone, and the first portion of the convection heat cure oven (referred to as the Radiant Zone) are controlled by a Regenerative Thermal Oxidizer (RTO).	08-12-2013 02-24-2016 10-17-2018	FGPAINT FGCAMPLAN
EUGENERATOR-1	A 250 HP diesel fired emergency generator.	08-01-1999	FGNESHAPZZZZ
EUFIREPUMP	A 130 BHP diesel fired emergency fire pump.	08-01-1999	FGNESHAPZZZZ
EUSPOTPRIME	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	05-01-2015	FGRULE290
EU290-1	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	11-01-2013	FGRULE290
EU290-2	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	01-01-2015	FGRULE290

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU290-3	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	08-01-1999	FGRULE290
EU290-4	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	01-01-2015	FGRULE290
EU290-5	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	11-01-2015	FGRULE290
EU290-6	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	11-01-2015	FGRULE290
EU290-7	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	11-01-2015	FGRULE290
EU290-8	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	03-01-2015	FGRULE290
EU290-9	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	12-01-2015	FGRULE290
EU290-10	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	12-01-2015	FGRULE290
EU290-11	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a and 290.	12-01-2015	FGRULE290
EUCOLDCLEANER-1	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 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.	08-12-2013	FGCOLDCLEANERS
EUCOLDCLEANER-2	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 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.	10-01-2015	FGCOLDCLEANERS
EUCOLDCLEANER-3	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 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.	01-01-2016	FGCOLDCLEANERS

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCOLDCLEANER-4	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 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.	05-01-2016	FGCOLDCLEANERS
EUGENERATOR-2	A natural gas-fueled emergency engine manufactured in 2011	11-01-2015	FGNSPSJJJJ
EUPRIME	Any existing or future emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rules 278, 278a and 287(2)(c).	11-01-2015	FGRULE287(2)(c)
EUMISC	Any existing or future emission units that emit air contaminants and are exempt from the requirements of Rule 201 pursuant to Rules 278, 278a and 290.	11-01-2015	FGRULE290

**EUCARBONMOLD
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Seven (7) oil-heated molding presses with a 3.2 MMBTU/hr natural gas-fired boiler to heat the oil, two (2) electrically heated autoclaves, and one (1) natural gas-fired autoclave.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	2.9 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUCARBONMOLD	SC VI.3	R 336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC Content of mold release	6.4 lb/gal (minus water) ^a as applied ²	Instantaneous	EUCARBONMOLD	SC VI.2	R 336.1702(a)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials and 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))
2. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² (R 336.1224, R 336.1225, R 336.1702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required records in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1702(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a monthly basis for EUCARBONMOLD:
 - a. Gallons (with water) of each material used.
 - b. VOC content (minus water and with water) of each material as applied.
 - c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702(a))**

See Appendix 7

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

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).

**EUPULTRUSION
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Single pultrusion line in which reinforcing fiber materials are pulled through a resin bath and then a series of preform plates which shape the coated fibers into the desired profile. The coated fibers are then drawn through a heated die which initiates an exothermic reaction and polymerizes the thermosetting resins to produce composite rods and tubes. The finished product is then cut to desired lengths with a wet saw.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	4,000 lb./yr ²	12-month rolling time period as determined at the end of each calendar month	EUPULTRUSION	SC VI.3	R 336.1702(a)
2. Acetone (CAS No. 67-64-1)	790 lb./yr ¹	12-month rolling time period as determined at the end of each calendar month	EUPULTRUSION	SC VI.3	R 336.1224, R 3361225

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste resins and cleanup solvents used in EUPULTRUSION and store them in closed containers. The permittee shall dispose of waste materials (resins, additives, catalysts, mold release materials, cleanup solvents, etc.) in an acceptable manner in compliance with all applicable state rules and federal regulations.² (R 336.1224, R 336.1225, R 336.1702(a))

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 last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1224, R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (resins, additives, catalysts, mold release materials, cleanup solvents, etc.), including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702)**
3. The permittee shall keep the following information for each calendar month for EUPULTRUSION:
 - a. The identity and amount (in pounds) of each material (resins, additives, catalysts, mold release materials, cleanup solvents, etc.) used.
 - b. VOC content, in percent by weight, of each material (resins, additives, catalysts, mold release materials, cleanup solvents, etc.) as applied.
 - c. Acetone content, in percent by weight, of each material (cleanup solvents, etc.) as applied.
 - d. The appropriate emission factor for each material used. (Emission factors from EPA-AP-42 Section 4.4 for Polyester Resin Plastics Production Fabrication may be used, or an alternate factor approved by the AQD District Supervisor).
 - e. VOC mass emission calculations determining the monthly emission rate in pounds per calendar month, and the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.
 - f. Acetone emission calculations determining the monthly emission rate in pounds per calendar month, and the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702(a))**

See Appendix 7

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-PULTRUSION	20 ²	40 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

**EUADHESIVE
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Robotic bonding process in open plant area.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC and acetone	10.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUADHESIVE	SC VI.2, VI.3	R 336.1224 R 336.1702(a)
2. MDI Isomer CAS No. 9016-87-9)	0.34 lb/day ¹	Calendar Day	EUADHESIVE	SC VI.2, VI.4	R 336.1225(1)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC Content of Primers	4.7 lb/gal (minus water) ^a as applied ¹	Instantaneous	EUADHESIVE	SC V.1, VI.2	R 336.1225(1)
2. VOC content of adhesives	0.24 lb/gal (minus water) ^a as applied ¹	Instantaneous	EUADHESIVE	SC V.1, VI.2	R 336.1225(1)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials and 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))**
2. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1224, R 336.1225, R 336.1702(a))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUADHESIVE with non-atomized applicators or comparable technology with equivalent transfer efficiency.² **(R 336.1702(a))**

V. TESTING/SAMPLING

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

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

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1224, R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a monthly basis for EUADHESIVE:
 - a. Gallons (with water) of each material used.
 - b. VOC content (minus water and with water) and acetone content of each material as applied.
 - c. VOC and acetone mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d. 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 and make them available to the Department upon request.² **(R 336.1224, R 336.1702(a))**

4. The permittee shall keep the following information on a daily basis for EUADHESIVE:
 - a. Gallons (with water) of each MDI Isomer (CAS No. 9016-87-9) containing material used.
 - b. Where applicable, gallons (with water) of each MDI Isomer (CAS No. 9016-87-9) containing material reclaimed.
 - c. The MDI Isomer (CAS No. 9016-87-9) content (with water) in pounds per gallon of each material used.
 - d. The appropriate emission factor for each MDI Isomer (CAS No. 9016-87-9) containing material. (An emission factor of 1% of the weight percent of MDI Isomer (CAS No. 9016-87-9) based on reactivity may be used, or an alternate emission factor approved by the AQD District Supervisor).
 - e. MDI Isomer (CAS No. 9016-87-9) mass emission calculations determining the daily emission rate in pounds per calendar day.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702(a))**

See Appendix 7

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

Footnotes:

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

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

D. FLEXIBLE GROUP SPECIAL CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGPAINT	One conveyORIZED paint line for spray coating of plastic automotive parts. EUPAINTLINE-1 is constructed with a damper that allows emissions to be exhausted to the RTO or directly to a stack when RTO is off.	EUPAINTLINE-1
FGCAMPLAN	The emissions associated with EUPAINTLINE-1 are controlled by the RTO and are subject to Compliance Assurance Monitoring (CAM).	EUPAINTLINE-1
FGNESHAPZZZZ	Any existing and/or future internal combustion engine subject to the requirements of the reciprocating internal combustion engine NESHAP (40 CFR Part 63, Subpart ZZZZ).	EUGENERATOR-1 EUFIREPUMP
FGNSPSJJJJ	Any existing and/or future Stationary Reciprocating Internal Combustion Engines subject to the requirements of the reciprocating internal combustion engine NSPS (40 CFR Part 60, Subpart JJJJ).	EUGENERATOR-2
FGRULE287(2)(c)	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 287(2)(c). Emission units installed/modified before December 20, 2016, may show compliance with Rule 287 in effect at the time of installation/modification.	EUPRIME
FGRULE290	Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.	EUSPOTPRIME EU290-1 EU290-2 EU290-3 EU290-4 EU290-5 EU290-6 EU290-7 EU290-8 EU290-9 EU290-10 EU290-11 EUMISC
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 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.	EUCOLDCLEANER-1 EUCOLDCLEANER-2 EUCOLDCLEANER-3 EUCOLDCLEANER-4

**FGPAINT
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

One (1) conveyorized paint line for spray coating of plastic automotive parts. EUPAINTLINE-1 is subject to CAM, and the requirements are included in FGCAMPLAN.

Emission Units: EUPAINTLINE-1

POLLUTION CONTROL EQUIPMENT

Dry overspray filters are utilized for the paint line, RTO controls both portions of the booth, post-booth flash tunnel, and the first section (referred to as the “Radiant Zone”) of the cure oven on EUPAINTLINE-1. EUPAINTLINE-1 is constructed with a damper that allows emissions to be exhausted to the RTO or directly to a stack when RTO is off.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC, Acetone (CAS No. 67-64-1), p-Chlorobenzotrifluoride (CAS No. 98-56-6), and Methyl acetate (CAS No. 79-20-9) combined ^a	35.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUPAINTLINE-1	SC VI.2 SC VI.3	R 336.1224, R 336.1702(a)
2. VOC, Acetone (CAS No. 67-64-1), p-Chlorobenzotrifluoride (CAS No. 98-56-6), and Methyl acetate (CAS No. 79-20-9) combined ^b	24.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	EU-PAINTLINE-1	SC VI.2 SC VI.3	R 336.1224, R 336.1702(a)
3. p-Chlorobenzotrifluoride (CAS No. 98-56-6)	106.8 lb/24-hr ¹	Calendar Day	FGPAINT	SC VI.2 SC VI.5	R 336.1225(1)

- a. This limit applies to controlled and uncontrolled operations combined.
 b. This limit applies to the uncontrolled operations portion only and shall not exceed 24.0 tpy.

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Primer	150.0 gal/day ¹	Calendar Day**	EU-PAINTLINE-1	SC V.1 SC VI.4	R 336.1225
2. Hardener	50.0 gal/day ¹	Calendar Day**	EU-PAINTLINE-1	SC V.1 SC VI.4	R 336.1225
3. Clearcoat	21.0 gal/day ¹	Calendar Day**	EU-PAINTLINE-1	SC V.1 SC VI.4	R 336.1225
4. Activator	7.0 gal/day ¹	Calendar Day**	EU-PAINTLINE-1	SC V.1 SC VI.4	R 336.1225
5. Purge Solvent	8.5 gal/day ¹	Calendar Day**	EU-PAINTLINE-1	SC V.1 SC VI.4	R 336.1225

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
6. VOC content of high-bake flexible coating primers	5.0 lb/gal (minus water) ^{a, 2} as applied	Instantaneous*	EU-PAINTLINE-1	SC V.1 SC VI.3	R 336.1702(d)
7. VOC content of topcoat clearcoats	4.0 lb/gal (minus water) ^{a, 2} as applied	Instantaneous*	EU-PAINTLINE-1	SC V.1 SC VI.3	R 336.1702(d)
8. VOC content of topcoat non-basecoat/clearcoat	4.3 lb/gal (minus water) ^{a, 2} as applied	Instantaneous*	EU-PAINTLINE-1	SC V.1 SC VI.3	R 336.1702(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))**

*Limit applies at all times per coating per line.

**Limit applies per coating per line when the RTO is not operating.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall capture all waste materials and 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)**
2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.² **(R 336.1224, R 336.1370)**
3. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.² **(R 336.1224, R 336.1225, R 336.1702)**
4. The permittee shall not operate the RTO on EU-PAINTLINE-1 unless a malfunction abatement plan (MAP) as described in Rule 911(2), is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a. A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of which major replacement parts will be maintained in inventory.
 - b. An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c. A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the AQD District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits.² **(R 336.1225, R 336.1702(a), R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate FGPAINT unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.² **(R 336.1224, R 336.1301, R 336.1910)**
2. The permittee shall equip and maintain FGPAINT with robots and electrostatic HVLP applicators, or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.² **(R 336.1702)**
3. The permittee shall not operate the RTO unless it is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC capture efficiency of 92.5 percent (by weight), a minimum VOC destruction efficiency of 95.0 percent (by weight), and maintaining a minimum temperature of 1500°F, or the minimum temperature from the most recent acceptable stack test, and a minimum retention time of 0.5 seconds.² **(R 336.1224, R 336.1225, R 336.1702, R 336.1902, R 336.1910)**
4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the thermal oxidizer to monitor and record the temperature on a continuous basis, during operation of the RTO with EUPAINTLINE-1.² **(R 336.1224, R 336.1225, R 336.1702, R 336.1902, R 336.1910)**

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any paint coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.² **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**
2. Within 5 years of the last test date and once every 5 years from the most recent test date thereafter, the permittee shall verify the overall VOC control efficiency of FGPAINT, the capture efficiency of FGPAINT, and the destruction efficiency of the RTO by testing at owner's expense, in accordance with Department requirements. If the RTO has not operated for 90 days or more preceding the 5-year testing deadline, testing may be delayed until the RTO resumes operation. The permittee shall send a written notification to the AQD District Supervisor within 7 days of any RTO startup that occurs more than 5 years after the most recent test date. Subsequent testing must be performed within 60 days of the startup of the RTO. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A, and 40 CFR Part 63, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.² **(R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**
3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1224, R 336.1225, R 336.1702)**

2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1224, R 336.1225, R 336.1702)**
3. The permittee shall keep the following information on a monthly basis separately for EUPAINTLINE-1:
 - a. Gallons (with water) of each material used.
 - b. VOC content (minus water and with water), acetone (CAS No. 67-64-1) content, p-chlorobezotrifluoride (CAS No. 98-56-6) content, and methyl acetate (CAS No. 79-20-9) content of each material as applied.
 - c. Mass emission calculations determining the controlled monthly emission rates in tons per calendar month for VOC, acetone (CAS No. 67-64-1), p-chlorobezotrifluoride (CAS No. 98-56-6), and methyl acetate (CAS No. 79-20-9), each separately, for EUPAINTLINE-1.
 - d. Mass emission calculations determining the uncontrolled monthly emission rates in tons per calendar month for VOC, acetone (CAS No. 67-64-1), p-chlorobezotrifluoride (CAS No. 98-56-6), and methyl acetate (CAS No. 79-20-9), each separately, for EUPAINTLINE-1.
 - e. Mass emission calculations determining the total monthly emission rate of VOC, acetone (CAS No. 67-64-1), p-chlorobezotrifluoride (CAS No. 98-56-6), and methyl acetate (CAS No. 79-20-9), combined in tons per calendar month for EU-PAINTLINE-1 (controlled and uncontrolled emissions combined) for EUPAINTLINE-1.
 - f. Mass emission calculations determining the annual controlled emission rates in tons per 12-month rolling time period as determined at the end of each calendar month for VOC, acetone (CAS No. 67-64-1), p-chlorobezotrifluoride (CAS No. 98-56-6), and methyl acetate (CAS No. 79-20-9) combined for EUPAINTLINE-1.
 - g. Mass emission calculations determining the annual uncontrolled emission rates in tons per 12-month rolling time period as determined at the end of each calendar month for VOC, acetone (CAS No. 67-64-1), p-chlorobezotrifluoride (CAS No. 98-56-6), and methyl acetate (CAS No. 79-20-9) combined for EUPAINTLINE-1.
 - h. Mass emission calculations determining the total annual emission rates in tons per 12-month rolling time period as determined at the end of each calendar month for VOC, acetone (CAS No. 67-64-1), p-chlorobezotrifluoride (CAS No. 98-56-6), and methyl acetate (CAS No. 79-20-9) combined for EUPAINTLINE-1 (controlled and uncontrolled emissions combined).

The permittee shall keep the records using mass balance, or an alternative method and 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 336.1224, R 336.1702)**

4. The permittee shall keep the following information on a daily basis for EUPAINTLINE-1:
 - a. The start time and stop time of the RTO.
 - b. If the RTO is not in operation:
 - i. Gallons (with water) of each material used.
 - ii. VOC content (minus water) of each material as applied.

The permittee shall keep the records using mass balance, or an alternative format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1225, R 336.1702)**

5. The permittee shall keep the following information on a daily basis for FGPAINT:
 - a. Gallons (with water) of each p-Chlorobenzotrifluoride (CAS No. 98-56-6) containing material used.

- b. Where applicable, gallons (with water) of each p-Chlorobenzotrifluoride (CAS No. 98-56-6) containing material reclaimed.
- c. The p-Chlorobenzotrifluoride (CAS No. 98-56-6) content (with water) in pounds per gallon or pound per pound of each material used.
- d. The p-Chlorobenzotrifluoride (CAS No. 98-56-6) mass emission calculations determining the daily emission rate in pounds per calendar day for FGPAINT.

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

- 6. When the RTO is in operation the permittee shall monitor and record, in a satisfactory manner, the temperature in the RTO on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. 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 336.1225, R 336.1702(a), R 336.1910)**
- 7. The permittee shall continuously monitor combustion chamber temperature and record in fifteen-minute (15) intervals as an indicator of proper operation of the RTO. The indicator range is minimum 1500°F or a minimum temperature established during most recent acceptable performance test. **(40 CFR 64.6(c)(1)(i) and (ii))**
- 8. For each control device in operation, the permittee shall conduct bypass monitoring for each bypass line such that the valve or closure method cannot be opened without creating an alarm condition for which a record shall be made. Records of the bypass line that was opened and the length of time the bypass line was opened shall be kept on file. **(40 CFR 64.3(a)(2))**
- 9. The temperature monitor shall continuously monitor combustion temperature of the RTO. The averaging period is 3-hours. The monitor shall be calibrated annually or according to manufacturer recommendations, whichever is more frequent. **(40 CFR 64.6(c)(1)(iii))**
- 10. An excursion for the RTO combustion temperature is a temperature below 1500°F or a minimum temperature established during most recent acceptable performance test. **(40 CFR 64.6(c)(2))**
- 11. 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). The paint system and the conveyers shall automatically shut down if the RTO malfunctions such as operating below minimum operating requirements. **(40 CFR 64.7(d))**
- 12. 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), 40 CFR 64.7(c))**
- 13. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**

- The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

See Appendix 7

VII. REPORTING

- Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
- 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))**
- 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))**
- Each semiannual report of monitoring and deviations shall include summary information on the number, duration, and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
- Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-RTO-1	42 ²	50 ²	R 336.1225, 40 CFR 52.21(c) & (d)
2. SV-NCG-1	8 ²	45 ²	40 CFR 52.21(c) & (d)
3. SV-Oven-1	20 ²	45 ²	R 336.1225, 40 CFR 52.21(c) & (d)
4. SV-Booth-2	34 ²	45 ²	R 336.1225, 40 CFR 52.21(c) & (d)
5. SV-Oven-2	12 ²	45 ²	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

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

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).

FGCAMPLAN FLEXIBLE GROUP CONDITIONS

DESCRIPTION

The emissions from the paint spray booth, post booth flash tunnel, and the radiant zone of the cure oven associated with EUPAINTLINE-1 may be exhausted to a Regenerative Thermal Oxidizer (RTO). EUPAINTLINE-1 is constructed with a damper that allows emissions to be exhausted to the RTO or directly to a stack when the RTO is off. EUPAINTLINE-1 is subject to CAM when the RTO is in operation.

Emission Unit: EUPAINTLINE-1

POLLUTION CONTROL EQUIPMENT

Regenerative Thermal Oxidizer (RTO) and associated capture system

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))**

1. The permittee shall verify VOC capture efficiency and VOC destruction efficiency on EUPAINTLINE-1 by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of 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 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d), 40 CFR 64.4(e))**
2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall continuously monitor outlet temperature and record the temperature every 15 minutes for an hourly average as an indicator of proper operation of the RTO. The minimum temperature is 1500°F. **(40 CFR 64.6(c)(1)(i) and (ii))**
2. The temperature monitor shall continuously monitor combustion chamber temperature. The monitor shall be calibrated annually. **(40 CFR 64.6(c)(1)(iii))**

3. An excursion is operation of EUPAINTLINE-1 when the combustion chamber temperature of the RTO is less than 1500°F. **(40 CFR 64.6(c)(2))**
4. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of FGCAMPLAN (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). When an excursion occurs the paint line is stopped until the RTO temperature is returned to the normal operating range. **(40 CFR 64.7(d))**
5. 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), 40 CFR 64.7(c))**
6. The permittee shall properly maintain the monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**
7. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**
8. The permittee shall evaluate the capture efficiency of the capture system by at a minimum conducting daily visual inspections of the paint enclosure non-ducted opening to ensure negative pressure inside the enclosure. Adjustments shall be made to the air ventilation balance to ensure negative pressure inside the booth. **(40 CFR 64.3(a)(2))**
9. The permittee shall conduct semiannual and annual inspections of the RTO including all interlocks, dampers, and valves as outlined in the most recent CAM Plan approved by the AQD District Supervisor. **(40 CFR 64.3(a)(2))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration, and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**

5. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

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

Footnotes:

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

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

FGNESHAPZZZZ
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 (CI) RICE equal to or less than 500 brake hp. A RICE is existing if the date of installation is before June 12, 2006.

Emission Units: EUGENERATOR-1, EUFIREPUMP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall burn only diesel fuel in each engine with a maximum sulfur content of 15 ppm (0.0015 percent) by weight and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. **(40 CFR 63.6604(b), 40 CFR 1090.305)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must comply with the requirements in Item 1 of Table 2c of 40 CFR Part 63, Subpart ZZZZ which apply to each engine in FGNESHAPZZZZ as specified in the following:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If the emergency engine is being operated during an emergency and it is not possible to shut down the engine to perform the management practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management 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 management 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.1)**

2. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC III.1. The oil analysis must be performed at the same frequency specified for changing the oil in SC III.1. **(40 CFR 63.6625(i))**

3. The permittee shall operate and maintain each engine in FGNEHAPZZZZ and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a 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), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6.9)**
4. For each engine in FGNEHAPZZZZ, the permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time 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 may operate each engine in FGNEHAPZZZZ for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2))**
6. Each engine in FGNEHAPZZZZ may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in **SC III.5**. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. **(40 CFR 63.6640(f)(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain each engine in FGNEHAPZZZZ with non-resettable hours meters to track the operating hours. **(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, 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: Total Base Number is less than 30% of the Total Base 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 these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee 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 permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee 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(i))**

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 FGNEHAPZZZZ, the permittee shall keep in a satisfactory manner the following:
 - a. A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted,
 - b. Records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment,

- c. Records of performance tests and performance evaluations,
- d. Records of all required maintenance performed on the air pollution control and monitoring equipment,
- e. 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), 40 CFR 63.6660)**

- 2. For each engine in FGNEHAPZZZZ, the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with the operation and maintenance of the engine according to the manufacturer's emission-related operation and maintenance instructions; or of a maintenance plan that provides 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. 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, 40 CFR Part 63, Subpart ZZZZ, Table 6.9)**
- 3. For each engine in FGNEHAPZZZZ, 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)**
- 4. The permittee shall monitor and record, the total hours of operation for each engine in FGNEHAPZZZZ on a monthly basis, and the hours of operation during emergency and non-emergency service that are recorded through the non-resettable hour meter for each engine in FGNEHAPZZZZ on a calendar year basis, in a manner acceptable to the AQD District Supervisor. The permittee shall document how many hours are spent for emergency operation including what classified the operation as emergency and how many hours are spent for non-emergency operation. 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)**
- 5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FGNEHAPZZZZ, demonstrating that the fuel meets the requirement of SC II.1. The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. The permittee shall keep all records on file and make them available to the department upon request. **(R 336.1213(3), 40 CFR 1090.305)**
- 6. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). **(40 CFR 63.6660(a))**
- 7. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5-years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.6660(b))**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements 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. **(40 CFR Part 63, Subparts A and ZZZZ)**

FGNSPSJJJJ FLEXIBLE GROUP CONDITIONS

DESCRIPTION

40 CFR Part 60, Subpart JJJJ – New Source Performance Standards for Stationary Reciprocating Internal Combustion Engines (RICE), located at an area source of HAP emissions, new emergency, spark ignition RICE less than 500 brake hp.

Emission Unit: EUGENERATOR-2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. There is no time limit on the use of emergency stationary RICE in emergency situations. **(40 CFR 60.4243(d)(1))**
2. The permittee may operate each engine in FGNSPSJJJJ for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. **(40 CFR 60.4243(d)(2))**
3. The permittee may operate each engine in FGNSPSJJJJ 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. Except as provided in 40 CFR 60.4243(d)(3), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the permittee to supply non-emergency power as part of a financial arrangement with another entity. **(40 CFR 60.4243(d)(3))**
4. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: **(40 CFR 60.4243(d)(3)(i))**
 - a. The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - b. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - c. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

- d. The power is provided only to the facility itself or to support the local transmission and distribution system. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install a non-resettable hour meter on each engine in FGNSPSJJJJ. **(40 CFR 60.4237(c))**
2. Each engine in FGNSPSJJJJ shall be certified to meet the applicable emission standard of 40 CFR 60.4233. The permittee shall install and configure each engine according to the manufacturer's specifications. **(40 CFR 60.4243)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.6655)**

1. If the engine is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows: **(40 CFR 60.4243, 40 CFR 60.4244)**
 - a. Conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.
 - b. If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4244.
 - c. Conduct subsequent performance testing every 8,760 hours of engine operation or every 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.
 - d. No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii), 40 CFR 63.6655)**

1. For each engine in FGNSPSJJJJ the permittee shall keep in a satisfactory manner, records of all maintenance conducted on the applicable engine. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 60.4245(a)(2))**
2. The permittee shall keep, in a satisfactory manner, the following records for each engine in FGNSPSJJJJ:
 - a. For each certified engine: the permittee shall keep records of the manufacturer certification documentation.
 - b. For each uncertified engine: the permittee shall keep records of testing required in SC V.1.

The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4243(b))**

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

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

- 4 If any engine in FGNSPSJJJJ does not meet the standards applicable to non-emergency engines for the applicable size and model year then the permittee shall monitor and record the operation of any engine in FGNSPSJJJJ in emergency and non-emergency service that are recorded through the non-resettable hours meter, in a manner acceptable to the District Supervisor, Air Quality Division. The permittee shall document the time of operation of the engine and the reason the engine was in operation during that time. **(40 CFR 60.4245(b))**

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

VII. REPORTING

1. If any engine in FGNSPSJJJJ is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 60.4243(d)(3)(i), the permittee must submit an annual report including the following: **(40 CFR 60.4245(e), 40 CFR Part 60, Subparts A and JJJJ)**
 - a. The company name and address where the engine is located;
 - b. Date of the report and beginning and ending dates of the reporting period;
 - c. Engine site rating and model year;
 - d. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place;
 - e. Hours spent for operation for the purposes specified in 40 CFR 60.4243(d)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 60.4243(d)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

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

**FGRULE287(2)(c)
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

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

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

Emission Units installed prior to December 20, 2016: EUPRIME

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

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

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGRULE290 FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201 pursuant to Rule 278, Rule 278a and Rule 290. Emission units installed/modified before December 20, 2016, may show compliance with Rule 290 in effect at the time of installation/modification.

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

Emission Units installed prior to December 20, 2016: EUSPOTPRIME, EU290-1, EU290-2, EU290-3, EU290-4, EU290-5, EU290-6, EU290-7, EU290-8, EU290-9, EU290-10, EU290-11, EUMISC

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

- b. The visible emissions from the emission unit are not more than 5% opacity in accordance with the methods contained in Rule 303. **(R 336.1290(2)(a)(iii)(B))**
- c. The initial threshold screening level for each particulate toxic air contaminant, excluding nuisance particulate, is more than 2.0 micrograms per cubic meter. **(R 336.1290(2)(a)(iii)(C))**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- 1. The permittee shall maintain records of the following information for each emission unit for each calendar month using the methods outlined in the EGLE, AQD Rule 290; Permit to Install Exemption Record form (EQP 3558) or in a format that is acceptable to the AQD District Supervisor. **(R 336.1213(3))**
 - a. Records identifying each air contaminant that is emitted. **(R 336.1213(3))**
 - b. Records identifying if each air contaminant is controlled or uncontrolled. **(R 336.1213(3))**
 - c. Records identifying if each air contaminant is either carcinogenic or non-carcinogenic. **(R 336.1213(3))**
 - d. Records identifying the ITSL and IRSL, if established, of each air contaminant that is being emitted under the provisions of Rules 290(2)(a)(ii) and (iii). **(R 336.1213(3))**

- e. Records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions in enough detail to demonstrate that the actual emissions of the emission unit meet the emission limits outlined in this table and Rule 290. Volatile organic compound emissions from units installed on or after December 20, 2016, shall be calculated using mass balance, generally accepted engineering calculations, or another method acceptable to the AQD District Supervisor. **(R 336.1213(3), R 336.1290(2)(d))**
 - f. Records are maintained on file for the most recent 2-year period and are made available to the department upon request. **(R 336.1213(3), R 336.1290(2)(e))**
2. The permittee shall maintain an inventory of each emission unit that is exempt pursuant to Rule 290. This inventory shall include the following information. **(R 336.1213(3))**
- a. The permittee shall maintain a written description of each emission unit as it is maintained and operated throughout the life of the emission unit. **(R 336.1290(2)(c), R 336.1213(3))**
 - b. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall maintain a written description of the control device, including the designed control efficiency and the designed exhaust gas flow rate. **(R 336.1213(3))**
3. For each emission unit that emits noncarcinogenic particulate air contaminants pursuant to Rule 290(2)(a)(iii), the permittee shall perform a monthly visible emission observation of each stack or vent during routine operating conditions. This observation need not be performed using Method 9. The permittee shall keep a written record of the results of each observation. **(R 336.1213(3))**

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

FGCOLDCLEANERS 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 Units: EUCOLDCLEANER-1, EUCOLDCLEANER-2, EUCOLDCLEANER-3, EUCOLDCLEANER-4

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

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

IV. DESIGN/EQUIPMENT PARAMETER(S)

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

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

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

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

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

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

APPENDICES

Appendix 1. Acronyms and Abbreviations

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

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

Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3. Monitoring Requirements

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

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-P0374-2017. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-P0374-2017b is being reissued as Source-Wide PTI No. MI-PTI-P0374-2022.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
130-12E	201900028	Removed RTO Requirements from EUPAINTLINE-1 and included material limits and VOC content limits so EUPAINTLINE-1 can operate in FGPAINT without the use of the RTO.	FGPAINT/Source-Wide
126-18	201900064	Increased VOC limit from 300 lb/yr to 4,000 lb/yr.	EUPULTRUSION
180-19	202000043	Moved EUPULTRUSION form Section 2 to Section 1.	EUPULTRUSION

Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in EUPAINTLINE-1 and FGPAINT:

Example Mass Balance Equation to be used where appropriate, or an alternate calculation approved by the AQD District Supervisor.

$$\frac{\text{Pounds of VOC emitted}}{\text{Year}} = \frac{\text{Pounds of VOC}}{\text{Gallon of Coating}} * \frac{\text{Gallons of Coating Used}}{\text{Year}} * \text{Control Efficiency}^a$$

^a Control efficiency should only be used for FGPAINT and the Source-Wide HAP emission calculations.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

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

B. Other Reporting

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