MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT AIR QUALITY DIVISION

April 8, 2010

PERMIT TO INSTALL No. 53-80D

ISSUED TO Coastal Container Corporation

LOCATED AT

1201 Industrial Avenue Holland, Michigan 49423

IN THE COUNTY OF Allegan

STATE REGISTRATION NUMBER B5453

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Natural Resources and Environment. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:

March 30-2010

DATE PERMIT TO INSTALL APPROVED: April 8, 2010	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

Section	Page
Alphabetical Listing of Common Abbreviations / Acronyms	2
General Conditions	
Special Conditions	5
Emission Unit Summary Table	5
Special Conditions for EUWOODBOILER	
Special Conditions for EUSILOS	
Special Conditions for EUMETERINGBIN	
Special Conditions for EUCONVEYANCE	

Common Abbreviations / Acronyms

Common Acronyms			Pollutant/Measurement Abbreviations
AQD	Air Quality Division	BTU	British Thermal Unit
ANSI	American National Standards Institute	°C	Degrees Celsius
BACT	Best Available Control Technology	со	Carbon Monoxide
CAA	Clean Air Act	dscf	Dry standard cubic foot
CEM	Continuous Emission Monitoring	dscm	Dry standard cubic meter
CFR	Code of Federal Regulations	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H_2S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality	РМ	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM10	PM less than 10 microns diameter
MSDS	Material Safety Data Sheet	PM2.5	PM less than 2.5 microns diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	pph	Pound per hour
NSPS	New Source Performance Standards	ppm	Parts per million
NSR	New Source Review	ppmv	Parts per million by volume
PS	Performance Specification	ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge
PTI	Permit to Install	scf	Standard cubic feet
RACT	Reasonably Available Control Technology	sec	Seconds
ROP	Renewable Operating Permit	SO ₂	Sulfur Dioxide
SC	Special Condition	THC	Total Hydrocarbons
SCR	Selective Catalytic Reduction	tpy	Tons per year
SRN	State Registration Number	μg	Microgram
TAC	Toxic Air Contaminant	VOC	Volatile Organic Compounds
TEQ	Toxicity Equivalence Quotient	yr	Year
VE	Visible Emissions		

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

GENERAL CONDITIONS

- The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install 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 this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit 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 R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. 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 Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). (R 336.1912)
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. (R 336.1301)
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
- 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 R 336.1370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. (R 336.2001)

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID		
EUWOODBOILER	22.5 MMBtu/hr heat input wood fired boiler with a multiclone dust collector.	NA		
EUSILOS	Two wood silos controlled by a baghouse.	NA		
EUMETERINGBIN	Metering bin controlled by a baghouse.	NA		
EUCONVEYANCE Cardboard trim pneumatic conveyance system with mechanical cyclone collector. NA				
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.				

The following conditions apply to: EUWOODBOILER

DESCRIPTION: A 22.5 MMBtu/hr heat input wood fired boiler with a multiclone dust collector. **Flexible Group ID:**

POLLUTION CONTROL EQUIPMENT: multiclone dust collector

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.30 lb/MMBtu	Test Protocol	EUWOODBOILER	General Condition No. 13	R 336.1331
2. PM10	6.08 pph	Test Protocol	EUWOODBOILER	General Condition No. 13	R 336.2803, R 336.2804, 40 CFR 52.21 Subparts (c) & (d)
3. Formaldehyde	0.127 pph	Test Protocol	EUWOODBOILER	General Condition No. 13	R 336.1225

II. MATERIAL LIMITS

1. The permittee shall burn only virgin or high quality wood saw dust in EUWOODBOILER. (R 336.1225)

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The heat input capacity of EUWOODBOILER shall not exceed a maximum of 22.5 million Btu per hour. (R 336.1205, R 336.1225)
- The permittee shall operate EUWOODBOILER in accordance with manufacturer's recommendations for safe and proper operation to minimize emissions during periods of startup, shutdown and malfunction. (R 336.1912)
- 3. Within 90 days after permit issuance, the permittee shall submit to the AQD District Supervisor, for review and approval, a plan to ensure that only virgin or high quality wood waste is being burned in EUWOODBOILER and to prevent unacceptable waste from being burned in the boiler. The permittee shall not operate EUWOODBOILER unless the approved plan, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall, at a minimum, specify the following:
 - a) A description of wood waste to be burned.
 - b) Inspection and sorting procedures and protocol used to eliminate prohibited materials and minimize non-wood and unacceptable wood waste.
 - c) Procedures for rejecting and/or removing unacceptable wood waste and residue materials.
 - d) Auditing procedures including records of fuel specification, load identification, quality control of load and fuel pile.
 - e) Odor minimization.

The permittee shall amend the plan within 45 days, if any changes are deemed necessary or upon request from the District Supervisor. The permittee shall submit any amendments to the plan to the AQD District Supervisor for review and approval. (R 336.1225, R 336.1301(c), R 336.1331, R 336.1901)

4. The permittee shall not operate EUWOODBOILER unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the boiler, has been submitted within 60 days of permit issuance, and is implemented and maintained. The permittee shall also include in the MAP an acceptable plan that describes how emissions will be minimized during all startups, shutdowns, and malfunctions. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices and visible emissions readings. 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 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. (R 336.1301, R 336.1911, R 336.1912)

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUWOODBOILER unless the multi-cyclone collector is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes operating and maintaining the multi-cyclone collector in accordance with the manufacturer's specifications for optimal performance. (R 336.1225, R 336.1301, R 336.1331, R 336.1910)

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- Whenever EUWOODBOILER is in operation, daily visible emissions observations (a full 6-minute average reading) shall be conducted, either by a certified reader or a non-certified reader, to verify proper operation of EUWOODBOILER. If excessive visible emissions are observed, corrective action shall be initiated immediately. Records of the visible emissions observations (date, time, name of reader, whether the reader is certified or not), causes of abnormal opacity, corrective actions, and the results of such actions shall be maintained. A non-certified visible emissions reader shall have been certified for US EPA Reference Method 9 (40 CFR Part 60, Appendix A) at least once during the preceding 5-year period. (R 336.1301, R 336.1331, R 336.1910)
- 2. The permittee shall keep, in a satisfactory manner, records of the date, duration and description of any malfunctions and corrective maintenance performed that may impact the air emissions of EUWOODBOILER. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1912)

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

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. EUWOODBOILER	21 x 21	44	R 336.1225, R 336.2803, R 336.2804, 40 CFR52.21
			(c)&(d)

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EUSILOS

DESCRIPTION: Two wood silos controlled by a baghouse.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Baghouse

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.01 lb/1,000 lb	Test Protocol	EUSILOS	General Condition No. 13	R 336.1331

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

 The permittee shall not operate EUSILOS unless the baghouse is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes operating and maintaining the baghouse in accordance with the manufacturer's specifications for optimal performance. (R 336.1225, R 336.1301, R 336.1331, R 336.1910)

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

- Whenever wood sawdust is being loaded to EUSILOS, daily visible emissions observations (a full 6-minute average reading if visible emissions are observed) during the virgin or high quality wood saw dust loading shall be conducted, either by a certified reader or a non-certified reader, to verify proper operation of EUSILOS. If excessive visible emissions are observed, corrective action shall be initiated immediately. Records of the visible emissions observations (date, time, name of reader, whether the reader is certified or not), causes of abnormal opacity, corrective actions, and the results of such actions shall be maintained. A non-certified visible emissions reader shall have been certified for US EPA Reference Method 9 (40 CFR Part 60, Appendix A) at least once during the preceding 5-year period. (R 336.1301, R 336.1331, R 336.1910
- 2. The permittee shall not operate EUSILOS unless a malfunction abatement plan (MAP) as described in Rule 911(2), for wood dust handling, transferring and storage, has been submitted within 60 days of permit issuance, and is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices and visible emissions readings. 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 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. (R 336.1331, R 336.1910, R 336.1911)

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

N/A

The following conditions apply to: EUMETERINGBIN

DESCRIPTION: Metering bin controlled by a baghouse

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Baghouse

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.01 lb/1,000 lb	Test Protocol	EUMETERINGBIN	General Condition No. 13	R 336.1331

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

 The permittee shall not operate EUMETERINGBIN unless the baghouse is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes operating and maintaining the baghouse in accordance with the manufacturer's specifications for optimal performance. (R 336.1301, R 336.1331, R 336.1910)

V. TESTING/SAMPLING

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

N/A

VI. MONITORING/RECORDKEEPING

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

- Whenever wood dust is being transferred to EUMETERINGBIN, daily visible emissions observations (a full 6-minute average reading if visible emissions are observed) shall be conducted, either by a certified reader or a non-certified reader, to verify proper operation of EUMETERINGBIN. If excessive visible emissions are observed, corrective action shall be initiated immediately. Records of the visible emissions observations (date, time, name of reader, whether the reader is certified or not), causes of abnormal opacity, corrective actions, and the results of such actions shall be maintained. A non-certified visible emissions reader shall have been certified for US EPA Reference Method 9 (40 CFR Part 60, Appendix A) at least once during the preceding 5-year period. (R 336.1301, R 336.1331, R 336.1910)
- 2. The permittee shall not operate EUMETERINGBIN unless a malfunction abatement plan (MAP) as described in Rule 911(2), for wood dust handling, transferring and storage, has been submitted within 60 days of permit issuance, and is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices and visible emissions readings. 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 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. (R 336.1331, R 336.1910, R 336.1911)

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

N/A

The following conditions apply to: EUCONVEYANCE

DESCRIPTION: Cardboard trim pneumatic conveyance system with mechanical cyclone collector.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Mechanical cyclone collector

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.001 lb/1,000 lb	Test Protocol	EUCONVEYANCE	General Condition No. 13	R 336.1331
2. PM10	0.115 pph	Test Protocol	EUCONVEYANCE	General Condition No. 13	R 336.2803, R 336.2804, 40 CFR 52.21 Subparts (c) & (d)

3. Visible emissions from EUCONVEYANCE shall not exceed a six-minute average of 5 percent opacity. (R 336.1301(1)(c), R 336.1303, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUCONVEYANCE unless the mechanical cyclone collector is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes operating and maintaining the mechanical cyclone collector in accordance with the manufacturer's specifications for optimal performance. (R 336.1901, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d))

V. TESTING/SAMPLING

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

N/A

VI. MONITORING/RECORDKEEPING

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

- 1. Whenever cardboard trim is being handled by EUCONVEYANCE, daily visible emissions observations (a full 6-minute average reading if visible emissions are observed) shall be conducted, either by a certified reader or a non-certified reader, to verify proper operation of EUCONVEYANCE. If excessive visible emissions are observed, corrective action shall be initiated immediately. Records of the visible emissions observations (date, time, name of reader, whether the reader is certified or not), causes of abnormal opacity, corrective actions, and the results of such actions shall be maintained. A non-certified visible emissions reader shall have been certified for US EPA Reference Method 9 (40 CFR Part 60, Appendix A) at least once during the preceding 5-year period. (R 336.1301, R 336.1331, R 336.1910)
- 3. The permittee shall not operate EUCONVEYANCE unless a malfunction abatement plan (MAP) as described in Rule 911(2), for cardboard dust handling, transferring and storage, has been submitted within 60 days of permit issuance, and is implemented and maintained. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices and visible emissions readings. 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 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. (R 336.1331, R 336.1910, R 336.1911)

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

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

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCONVEYANCE	72 x 144	46	R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA