SUPPLEMENT TO PERMIT NO. 738-85A Eugene Welding Company Marlette, Michigan November 13, 1998

GENERAL CONDITIONS

- 1. Rule 201(1) The process or process equipment covered by this permit shall not be reconstructed, relocated, altered, 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.
- 2. Rule 201(4) If the installation, reconstruction, relocation, or alteration 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 person to whom this permit was issued, 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, reconstruction, relocation, or alteration of the equipment allowed by this Permit to Install.
- 3. Rule 201(6)(a) If this Permit to Install is issued for a process or process equipment located at a stationary source that is subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, trial operation is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install and until the appropriate terms and conditions of this Permit to Install have been incorporated into the Renewable Operating Permit. Upon incorporation of the appropriate terms and conditions into the Renewable Operating Permit, this Permit to Install shall become void.
- 4. Rules 201(6)(b) 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.
- 5. Rule 201(8) and Section 5510 of Act 451, P.A. 1994 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 Departments' rules or the Clean Air Act.
- 6. Rule 219 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. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality.
- 7. Rule 901 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

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> of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.

- 8. Rule 912 The owner or operator of a source, process, or process equipment shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant in excess of standards for more than one hour, or of any air contaminant in excess of standards for more than two hours, as required in this rule, to the District Supervisor, Air Quality Division. 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 District Supervisor within 10 days, with the information required in this rule.
- 9. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future applicable requirements which may be promulgated under Part 55 of Act 451, P.A. 1994 or the Clean Air Act.
- 10. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 11. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.
- 12. Rule 301 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, a person 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.
 - A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
 - 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.
- 13. Rule 370 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).

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- 14. Rule 285 Except as allowed by Rule 285 (a), (b), and (c), applicant shall not substitute any fuels, coatings, nor raw materials for those described in the application and allowed by this permit, nor make changes to the process or process equipment described in the application, without prior notification to and approval by the Air Quality Division.
- 15. The Department may require the applicant to conduct acceptable performance tests, at the applicant's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001.

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SPECIAL CONDITIONS

- 16. The total volatile organic compound (VOC) emission rate from the conveyorized paint line for the coating of miscellaneous metal parts, hereinafter "coating line", shall not exceed 24.2 pounds per hour nor 24.1 tons per year, based on a 12-month rolling time period as determined at the end of each calendar month.
- 17. The VOC emission rate from the coating line shall not exceed 3.0 pounds per gallon of coating (minus water), as applied.
- 18. The Hazardous Air Pollutants (HAP) as defined pursuant to section 112 (b) of the Clean Air Act, shall be less than 9 tons per year for any individual HAP or 22.5 tons per year for any combination of HAPS at this facility. This annual limit shall be based on a 12-month rolling time period as determined at the end of each calendar month.
- 19. The applicant shall keep a separate record for each calendar month of the following:
 - A. Number of gallons (including water) of each coating used, as applied.
 - B. The VOC content of each coating used in pounds per gallon (including water) as applied
 - C. The VOC content of each coating used in pounds per gallon (minus water)
 - D. Hours of operation

All such records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.

- 20. The applicant shall calculate the following for the coating line for each calendar month, using the method detailed in Appendix **A**, or an alternate method acceptable to the District Supervisor:
 - A. A calendar month VOC emission rate in tons per month.
 - B. TOTAL VOC emission rate for the 12-month rolling time period in tons per year

All such records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.

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- 21. The applicant shall calculate the following for the coating line for each calendar month, using the method detailed in Appendix **B**, or an alternate method acceptable to the District Supervisor:
 - A. Monthly calculations of each HAP emission rate in tons per month by process,
 - B. Monthly calculations of aggregate HAPs emissions in tons per month for all processes at the facility.
 - C. Monthly calculation of HAPs determining a 12-month rolling average emission rate in tons per year.

All such records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.

- 22. Applicant shall maintain a current listing of the chemical composition of each coating and reducer, including the weight percentage of each compound.
- 23. Applicant shall not operate the coating line unless the exhaust filters are installed and operating properly.
- 24. The disposal of spent filters and waste coatings shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.
- 25. Applicant shall equip and maintain the paint spray booth with airless applicators or an equivalent technology with comparable or better transfer efficiency. All coating applicators shall be properly installed, maintained, and operated according to manufacturers' specifications.
- 26. The exhaust gases from the coating line shall be discharged unobstructed vertically upwards to the ambient air from stacks with the following dimensions:

Stack	Maximum diameter, inches	Minimum height above ground (feet)
Booth 1	30	28
Booth 2	30	28
Oven 1	10	28
Oven 2	10	28

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APPENDIX A

Waterbased coatings, some VOC's

Company: Month/year:

Permit:

		Α	В	С	D	$E = (A^*C)$
Coating ID	Dat e	Gallons used (with water)	Coating density (lbs/gallon)	VOC content with water (lbs/gal)	Lbs VOC per gallon (minus water)	Lbs of VOC

Coating VOC emission limit, lbs/gal(minus water)= F	F 3.0 lbs/gal minus water			
Total pounds emitted this month = G =Sum of all E's	G			
Total tons VOC's emitted this month = H = G/2000	Н			
Total tons emitted 11 previous months = J	J			
Total tons emitted 12-month rolling period = K = H+J	K			
Limit 12 month rolling period, tons/yr =L K may = L or < L	L 24.1			

tons/yr

NOTES:

$$D = \frac{\left(\frac{LbsVOC}{galcoating - withwater}\right)}{\left[1 - \left(\frac{B \times wt\% \, water}{8.34 \times 100}\right)\right]} \text{ or } D = \text{ value from individual MSDS sheet}$$

APPENDIX B

HAPS breakdown for coatings. reducer. and cleaning solvent. control equipment.

Com	pany:

Permit No.: Month/year:

Permit No.:						IVI	onin/year.						
	А	В	$C = A \times B$	D1	E1=CxD1/100	D2	E2=CxD2/100	D3	E3=CxD3/100	D4	E4=CxD4/100	D5	E5=CxD5/10
Coating, component, reducer, or solvent ID	Gallons used, as received	Density in lbs/gal	Lbs used	HAP #1 % by wt	LBS HAP #1 (NAME)	HAP #2 % by wt	LBS HAP #2 (NAME)	HAP #3 % by wt	LBS HAP #3 (NAME)	HAP #4 % by wt	LBS HAP #4 (NAME)	HAP #5 % by wt	LBS HAP #5 (NAME)
Tons uncontrolled HAPS this month = F = sum of all E's/2000 F1				F2		F3		F4		F5			
Control factor from equipment = Q = See note 1					Q		Q		Q		Q		
Tons controlled HAPS this month = G = F * Q					G2		G3		G4		G5		
Tons individual HAPS for 11 previous months = Hi					H2		НЗ		H4		H5		
12 month rolling average tons individual HAPS = Ji = Gi + Hi					J2		J3		J4		J5		
12-month rolling average limit = K. J may = K or < K					Κ		K		К		K		
Notes:					Total	Total tons combined HAPS, this month = L = sum of all H's				L			
1. Q = Control factor = (Capture efficiency % * destruction efficiency %)/10,000						Total tons combined HAPS from 11 previous months = M				M			
							12-month rolling average, combined HAPS = N = L + M 2 month rolling average combined HAPS = P N may = P or < P				N		
						12 month	rolling averag	je combined	HAPS =P Nr	nay =P or <	۲	P	4