

SUPPLEMENT TO PERMIT NO. 142-88A

Genzink Steel Supply & Welding
Holland, Michigan

DRAFT

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 which is subject to a Renewable Operating Permit pursuant to Rule 210, trial operation is allowed 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 as a modification pursuant to Rule 216 or upon renewal pursuant to Rule 217. 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)(i) or 216(1)(a)(v)(A) - Except as provided in General Condition No. 3, operation of the process or process equipment is allowed if, not more than 30 days after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this Permit to Install was issued, or the authorized agent pursuant to Rule 204, notifies the District Supervisor, Air Quality Division, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, alteration, or modification is considered to occur not later than commencement of trial operation of the process or process equipment.
5. Rule 201(6)(b)(ii) - Except as provided in General Condition No. 3, not more than 18 months after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this permit was issued, or the authorized agent pursuant to Rule 204, shall notify the District Supervisor, Air Quality Division, in writing, of the status of compliance of the process or process equipment with the terms and conditions of the Permit to Install. The notification shall include all of the following:
 - A. The results of all testing, monitoring, and recordkeeping performed to determine the actual emissions from the process or process equipment and to demonstrate compliance with the terms and conditions of the Permit to Install.
 - B. A schedule of compliance for the process or process equipment as described in Rule 119(a).

- C. A statement, signed by the person owning or operating the process or process equipment, that, based on information and belief formed after reasonable inquiry, the statements and information in the notification are true, accurate, and complete.
6. Rule 201(7) 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.
7. 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 Rule 219 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 in Rule 219(1)(a), (b) and (c). The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality.
8. 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 of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.
9. 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.
10. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future regulations which may be promulgated under Part 55 of Act 451, P.A. 1994.
11. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
12. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.

SPECIAL CONDITIONS

13. The volatile organic compound (VOC) emission rate from Spray-booth No. 1, used for the coating of structural steel, shall not exceed 12 pounds per hour nor 9.6 tons per 12 month rolling time period as determined at the end of each calendar month.
14. The (VOC) emission rate from Spray-booth No. 2, used for the coating of structural steel, shall not exceed 12 pounds per hour nor 9.6 tons per 12 month rolling time period as determined at the end of each calendar month.
15. The VOC emission rate from the use of clean-up solvents in Spray-booth No. 1 and Spray-booth No. 2 shall not exceed 0.5 tons per 12 month rolling time period as determined at the end of each calendar month..
16. The emission rate of hazardous air pollutants (HAPs), as defined pursuant to Section 112(b) of the Clean Air Act, shall not exceed 8.3 tons per 12 month rolling time period as determined at the end of each calendar month.
17. The volume weighted average VOC content of coatings applied in Spray-booth No. 1 and Spray-booth No. 2 shall not exceed 4.63 pounds per gallon of coating (minus water) as applied, as determined on a calendar day averaging period. Daily records and conditions required in Special Condition No. 26 may be discontinued, if the applicant can show that each coating VOC content is below 4.63 pounds per gallon of coating (minus water) as applied per Special Condition No. 24(A).
18. Visible emissions from Spray-booth No. 1 or Spray-booth No. 2 shall not exceed a 6-minute average of 20% opacity, except as specified in Rule 301(1)(a) .
19. Applicant shall not operate Spray-booth No. 1 or Spray-booth No. 2 unless its respective fabric filter is installed and operating properly.
20. Rules 1001, 1003 and 1004 - Verification of VOC, styrene, and/or particulate emission rates by testing, at owner's expense, in accordance with Department requirements, may be required for operating approval. The testing shall be conducted within 60 days following the receipt of the written notification of the requirement. Verification of emission rates includes the submittal of a complete report of the test results. If testing is required, a complete test plan must be submitted to the Air Quality Division. The final plan must be approved by the Division prior to testing and a complete report of test results must be submitted to the Division within 60 days following the last date of testing.
21. The VOC content of any coating as applied and as received shall be determined using federal Reference Test Method 24. Upon prior approval of the District Supervisor, Air Quality Division, the VOC content may alternatively be determined from manufacturer's formulation

data, which includes batch composition from the coating manufacturer and the amount of reducing agent or other compounds added to the coating.

22. Applicant shall maintain a current listing of the manufacturer's formulation data for each coating.
23. The disposal of spent filters shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.
24. Applicant shall keep *monthly* records of the following for each spray booth:
 - A. The VOC content of each paint, solvent, and adhesive as applied on a calendar day basis.
 - B. The usage rate, in gallons, of each paint and solvent.
 - C. Amount, in gallons, of clean up and/or purge solvents used and/or reclaimed.
 - D. VOC emissions calculations determining a calendar month emission rate in tons per month and a 12-month rolling average emission rate in tons per year.

The records shall be kept in the format specified in Appendix A or an alternative format may be submitted to the District Supervisor, Air Quality Division, for approval. All such records shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.

25. Applicant shall keep the following *daily* records for each spray-booth, if necessary per Special Condition No. 17. Daily records and conditions may be discontinued if the applicant can show that each coating VOC content is below 4.63 pounds per gallon of coating (minus water) as applied per Special Condition 24(A).:
 - A. The VOC content of each paint or solvent in pounds per gallon (minus water) as received and as applied.
 - B. The usage rate, in gallons, of each paint and solvent.
 - C. VOC emissions calculations determining compliance with a volume weighted average VOC content of 4.63 lb/gallon (minus water) as applied, as determined for each calendar day.

The records shall be kept in the format specified in Appendix B or an alternative format may be submitted to the District Supervisor, Air Quality Division, for approval. All such records shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.

26. Applicant shall keep *monthly* records of the following for the plastic automotive parts coating process for each coating:
 - A. The amount in gallons used and the concentration of each HAP, in gallons or expressed as a weight percentage.
 - B. Calculations determining compliance with the emission limit in Special Condition No. 16.

The records shall be kept in the format specified in Appendix C or an alternate format may be submitted to the Air Quality Division District Supervisor for approval. All such records shall

be kept on file for a period of at least two years and made available to the Air Quality Division upon request.

27. All purge solvents and paints from all applicators used in the spray paint booths shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable state and federal rules and regulations.
28. The exhaust gases from Spray-booth No. 1 and Spray-booth No. 2 shall be discharged unobstructed vertically upwards to the ambient air from two stacks (one per booth) with maximum diameters of 48 inches and 38 inches, respectively at an exit point not less than 36 feet above ground level.