

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

August 25, 2015

**PERMIT TO INSTALL**  
1306-91D

**ISSUED TO**  
Lymtal International, Inc.

**LOCATED AT**  
4150 South Lapeer Road  
Lake Orion, Michigan

**IN THE COUNTY OF**  
Oakland

**STATE REGISTRATION NUMBER**  
N3417

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. 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:

**August 6, 2015**

DATE PERMIT TO INSTALL APPROVED:

**August 25, 2015**

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

## PERMIT TO INSTALL

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**Common Abbreviations / Acronyms**

<b>Common Acronyms</b>		<b>Pollutant / Measurement Abbreviations</b>	
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 <sub>2</sub> e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H <sub>2</sub> S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO <sub>x</sub>	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
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 <sub>2</sub>	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		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.

### GENERAL CONDITIONS

1. 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 48909-7760, 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 conditions or malfunction has been corrected, or within 30 days of discovery of 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.
  
12. 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.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Process Equipment &amp; Control Devices)</b>	<b>Flexible Group ID</b>
EUREACTOR1	Reactor for manufacturing polyurethane-based products. Activated carbon control.	FGREACTORS
EUREACTOR2	Reactor for manufacturing polyurethane-based products. Activated carbon control.	FGREACTORS
EUREACTOR3	Reactor for manufacturing polyurethane-based products. Activated carbon control.	FGREACTORS
EUREACTOR4	Reactor for manufacturing polyurethane-based products. Activated carbon control.	FGREACTORS
EUREACTOR5	Reactor for manufacturing polyurethane-based products. Activated carbon control.	FGREACTORS
EUREACTOR6	Reactor for manufacturing polyurethane-based products. Activated carbon control.	FGREACTORS
EUREACTOR7	Reactor for manufacturing polyurethane-based products. Activated carbon control.	FGREACTORS
EUREACTOR8	Reactor for manufacturing polyurethane-based products. Activated carbon control. (300 gallon Avon)	FGREACTORS
EUREACTOR9	Reactor for manufacturing polyurethane-based products. Activated carbon control. (500 gallon Scholds)	FGREACTORS
EUREACTOR10	Reactor for manufacturing polyurethane-based products. Activated carbon control. (175 gallon Stainless)	FGREACTORS
EUREACTORTR1	Reactor for manufacturing polyurethane-based products. Activated carbon control. (2,000 gallon)	FGREACTORS
EUREACTORTR2	Reactor for manufacturing polyurethane-based products. Activated carbon control. (2,000 gallon)	FGREACTORS
EUTDITANK	5,000 gallon TDI storage tank.	NA
EUIPDITANK	3,000 gallon IPDI storage tank.	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.		

**FLEXIBLE GROUP SUMMARY TABLE**

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

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGREACTORS	Reactors for manufacturing polyurethane-based products. Emissions are controlled by a dual-stage carbon adsorption system consisting of two (2) activated carbon canisters operating in series.	EUREACTOR1, EUREACTOR2, EUREACTOR3, EUREACTOR4, EUREACTOR5, EUREACTOR6, EUREACTOR7, EUREACTOR8, EUREACTOR9, EUREACTOR10, EUREACTORTR1, EUREACTORTR2
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

**The following conditions apply to:**  
**FGREACTORS**

**DESCRIPTION:** Reactors for manufacturing polyurethane-based products.

**Emission Units:** EUREACTOR1, EUREACTOR2, EUREACTOR3, EUREACTOR4, EUREACTOR5,  
EUREACTOR6, EUREACTOR7, EUREACTOR8, EUREACTOR9, EUREACTOR10, EUREACTORTR1,  
EUREACTORTR2

**POLLUTION CONTROL EQUIPMENT:** Dual-stage carbon adsorption system consisting of two (2) activated carbon canisters operating in series.

**I. EMISSION LIMITS**

NA

**II. MATERIAL LIMITS**

1. The permittee shall not add more than 16,000 pounds per year of solvent to the reactors of FGREACTORS during the dehydration process. "Solvent" includes, but is not limited to the following: 100 Solvent, Hi-Sol 10, and TS-100. **(R 336.1205(3), R 336.1225, R 336.1702(a))**

**III. PROCESS/OPERATIONAL RESTRICTIONS**

NA

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not process TDI, MDI, or IPDI in any FGREACTORS reactor unless the dual stage activated carbon adsorption system is installed, maintained, and operated in a satisfactory manner or the associated reactor is completely closed. **(R 336.1205(3), R 336.1225, R 336.1702(a))**
2. The permittee shall not manufacture polyurethane-base products in any FGREACTORS reactor unless the dual stage activated carbon adsorption system is installed, maintained, and operated in a satisfactory manner. **(R 336.1205(3), R 336.1225, R 336.1702(a))**

**V. TESTING/SAMPLING**

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

1. The permittee shall test, in a satisfactory manner, the dual stage carbon adsorption system for breakthrough of the first canister (first stage contactor) at least once per week. The permittee shall evaluate breakthrough via Tedlar bag sampling followed by laboratory analysis; by use of a hand-held instrument capable of detecting concentrations at the levels expected; or an equivalent method. The permittee shall conduct an initial test and shall record the initial reading as soon as the process has reached a steady state condition, but not later than 12 hours after start-up of the process. Breakthrough is considered a reading at the point between the first and second canisters that is 20 percent or more of the influent concentration into the first canister. If breakthrough is detected, the permittee shall not operate the system until the carbon in the first canister has been replaced and the operating order of the vessels has been reversed. The permittee shall repeat the initial test each time a carbon canister is replaced and shall use the resulting influent concentration to establish breakthrough. The permittee shall submit any request for a change in the testing frequency to the AQD District Supervisor for review and approval. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**



**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the pounds of solvent used for FGREACTORS during the dehydration process, as required by SC II.1. "Solvent" includes, but is not limited to the following: 100 Solvent, Hi-Sol 10, and TS-100. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(3), R 336.1225, R 336.1702(a))**
2. The permittee shall keep, in a satisfactory manner, all records of the carbon breakthrough monitoring and carbon replacement for FGREACTORS on file at the facility and make them available to the Department upon request. **(R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1910)**

**VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTIONS**

NA

**IX. OTHER REQUIREMENTS**

NA

**The following conditions apply Source-Wide to:**  
**FGFACILITY**

**DESCRIPTION:** All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. VOC	5 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.1, SC VI.2	<b>R 336.1702(a), R 336.1225</b>
2. Total HAPs	3 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.1, SC VI.2	<b>R 336.1205(3)</b>

**II. MATERIAL LIMITS**

NA

**III. PROCESS/OPERATIONAL RESTRICTIONS**

NA

**IV. DESIGN/EQUIPMENT PARAMETERS**

NA

**V. TESTING/SAMPLING**

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

NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall keep, in a satisfactory manner, records of the VOC and HAP concentrations of the solvent used during the dehydration process. "Solvent" includes, but is not limited to the following: 100 Solvent, Hi-Sol 10, and TS-100. **(R 336.1205(3), R 336.1225, R 336.1702(a))**
2. The permittee shall calculate the VOC and Total HAPs emission rates from FGFACILITY on a monthly and 12-month rolling time period, using a mass-balance calculation, emission factors, or other methods acceptable to the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(3), R 336.1225, R 336.1702(a))**

**VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTIONS**

NA

**IX. OTHER REQUIREMENTS**

NA