

SUPPLEMENT TO PERMIT NO. 780-92

Vinewood Corporation
Durand, Michigan

February 19, 1999

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 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 this 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) A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a special 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).
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.

SPECIAL CONDITIONS

16. The volatile organic compound (VOC) emission rate from the tote cleaning process, hereinafter "process", shall not exceed 8.5 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.
17. Applicant shall limit VOC losses from scratch pads moistened with cleaning materials by putting scratch pads that have become too dirty for further use in closed containers.
18. Applicant shall limit xylene and naphtha use as cleaning aids in the process to the amounts specified below, based on a 12-month rolling time period as determined at the end of each calendar month.

Material (used in cleaning aids)	Chemical Abstracts Service Registry Number	Maximum allowed use, gallons per year
Xylene	1330-20-7	300
Naphtha	64742-95-6	900

19. Applicant shall not clean more than 300 totes per week in the process based on a 12-month rolling time period as determined at the end of each calendar month.
20. Applicant shall keep monthly records of the amount, identity, and composition of cleaning materials used, and weekly records of the number of totes processed. These records, along with monthly calculations of VOC emissions, and monthly records of naphtha use and net xylene use as cleaning aids in the process, shall be kept on file for the most recent two year period and made available to the Air Quality Division upon request. Applicant shall calculate total VOC emissions by adding the VOC emissions from the contents of received totes to the emissions from use of cleaning aids. Applicant shall calculate the VOC emissions from the contents of received totes according to the method in Appendix A or an alternate method approved in writing by the District Supervisor, Air Quality Division. Applicant shall annually review the calculation method in use, considering the following factors:
 - the mix of totes and materials being processed
 - the composition of representative high-volume materials
 - current contracts and expected future contracts
 - other relevant factors

Applicant may propose a revised calculation method, in writing, at any time. The proposal shall include the basis for the new method, and a demonstration that the new method adequately demonstrates compliance with the emission limits in this permit. After written approval by the District Supervisor, Air Quality Division, Applicant shall implement the revised calculation method.

**Appendix A
 Monthly Emission Calculations**

Month ending _____ Summary prepared _____

Emissions from totes

A	B	C	D
Number of totes processed	Volume of each tote (cubic feet)	Conversion factor (pounds per cu. foot)	Emissions (pounds)
		0.00818	
		0.00818	
		0.00818	
		0.00818	

E

$A_i \times B_i \times C_i = D_i$

$E = \sum D_i$

Emissions from cleaning materials

Material	F	G	H	I
	Amount used (gal)	Density (#/gal)	Fraction emitted (per cent)	VOC emitted (pounds)
Xylene		7.25	100	
Aqualean 4784		8.84	1.0	
Sprayon 885		1.0625	10.42	
Midas Strip 3092 (naphtha)		7.33	80.1	

J

$F_j \times G_j \times H_j / 100 = I_j$

$J = \sum I_j$

Total emissions

Monthly emissions = E + J = _____ pounds = _____ tons

Rolling twelve month time period total = _____ tons