SUPPLEMENT TO PERMIT NO. 63-93A

General Filters, Inc. Novi, Michigan

DRAFT - January 30, 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 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(7)(a) 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(7)(b) 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).

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- 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(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.
- 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 the batch vapor degreaser, hereinafter "degreaser", shall not exceed 9.0 pounds per hour nor more than 9.0 tons per year based on a 12-month rolling average as determined at the end of each calendar month.
- 14. Applicant shall not use more than 1,475 gallons of trichloroethylene (TCE) per year based on a 12-month rolling time period as determined at the end of each calendar month. The usage rate shall be determined by mass balance of the gallons of TCE charged to the degreaser minus the

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gallons of TCE drained from the degreaser, plus the amount of TCE recovered from recycling spent solvents.

- 15. Rules 1001, 1003 and 1004 Verification of VOC emission rates from the degreaser by testing, at owner's expense, in accordance with Commission requirements, may be required. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the District Supervisor, Air Quality Division, and results shall be submitted within 120 days of the written requirement for such verification.
- 16. Applicant shall equip and maintain the degreaser with the following:
 - a. A cover that may be readily opened or closed, completely covers the cleaner openings when in place, and is free of cracks, holes, and other defects.
 - b. A freeboard ratio of at least 0.75.
 - c. A parts handling system with a speed control set to 3.3 meters per minute or less.
 - d. An automatic device that shuts off the sump heat if the sump liquid solvent level drops down to the height of the sump heater coils.
 - e. A vapor level control device which shuts off sump heat if the vapor level rises above the height of the primary condenser.
 - f. A cover that slides horizontally when the cover is being opened or closed, and a freeboard refrigerated device which results in a temperature of 85°F or less at the center of the air blanket and, movement of air across the degreaser less than 15.2 meters per minute at any time, hereinafter "reduced draft".
- 17. Applicant shall not operate the degreaser unless the degreaser is operated as follows:
 - a. The cover shall be closed during downtime mode.
 - b. The parts basket or parts being cleaned shall not occupy more than 50% of the solvent/air interface area.
 - c. Any spraying operations shall be done within the vapor zone.
 - d. Parts or parts baskets shall not be removed from the degreaser until condensation or dripping has stopped.
 - e. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from the degreaser.
 - f. During startup the primary condenser shall be turned on before the sump heater.
 - g. During shutdown of the degreaser, the sump heater shall be turned off, and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

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- h. When solvent is added to or drained from the degreaser, the solvent shall be transferred using leakproof couplings and closed plumbing directly to the sump or waste drum, and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- i. The room draft in the room the degreaser is located in is less than 15.2 meters per minute.
- j. The center of the degreasers' air blanket is at a temperature of 85°F or less.
- 18. The degreaser shall be maintained as recommended by the manufacturer of the equipment.
- 19. The applicant shall monitor and record the temperature at the center of the air blanket of the degreaser while the degreaser is in the idling mode on a monthly basis using a thermometer or thermocouple.
- 20. The applicant shall monitor and record the room draft using the following procedure on a monthly basis:
 - a. Determine the direction of the wind current by slowly rotating a velometer until the maximum speed is located.
 - b. Orient a velometer in the direction of the wind current at each of the four corners of the degreaser.
 - c. Record the reading for each corner.
 - d. Average the values obtained at each corner and record the average wind speed.
- 21. The applicant shall not operate the degreaser if the degreaser cover has cracks, holes or other defects.
- 22. The applicant shall monitor and record the hoist speed by measuring the time it takes to travel a measured distance (meters per minute) on a monthly basis.
- 23. The applicant shall keep the following records for the life of the degreaser:
 - a. Owner's manuals for the degreaser;
 - b. The date of installation of the degreaser.
- 24. The applicant shall keep the following records either in computerized or written form for five years following the date of the individual record:
 - a. The results of monitoring required by Special Condition Nos. 19, 20 and 22.
 - b. The dates and amounts of solvent that are added to and removed from the degreaser each calendar month.
 - c. The amount of credit given by recycling for TCE recovered from spent solvents.

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- d. Calculation sheets showing the monthly VOC emission rates from the degreaser, how the calculations were done and the results of all calculations, using the methods specified in Appendix A.
- 25. Applicant shall store waste solvent, still and sump bottoms, in closed containers. The closed containers may contain a device that will allow pressure relief, but do not allow liquid solvent to drain from the container.
- 26. The exhaust gases from the degreaser shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 8 inches at an exit point not less than 30 feet above ground level.