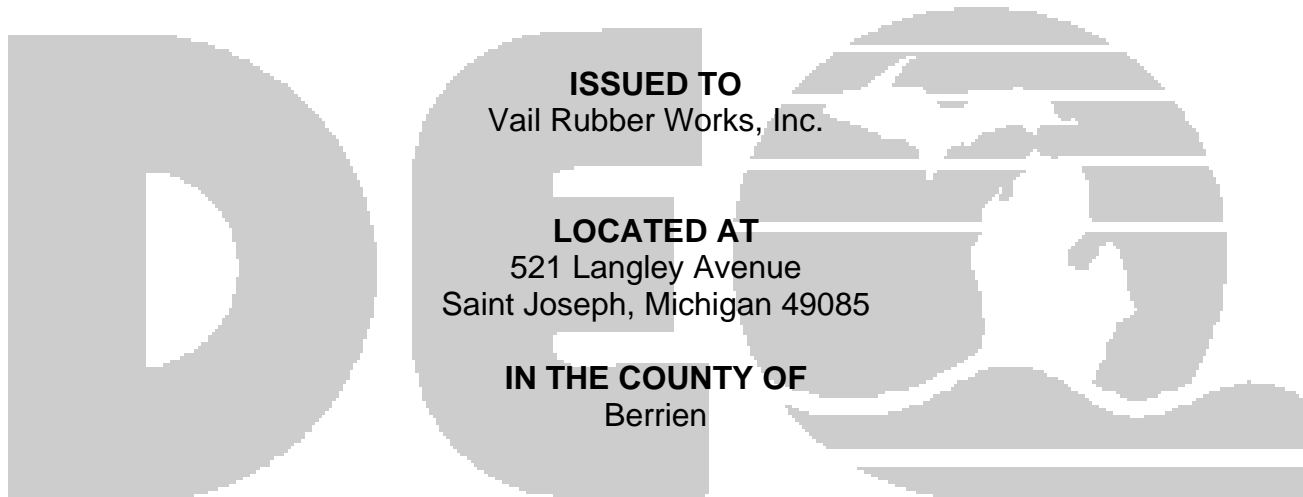


**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

October 25, 2007

**PERMIT TO INSTALL
No. 508-95C**



ISSUED TO
Vail Rubber Works, Inc.

LOCATED AT
521 Langley Avenue
Saint Joseph, Michigan 49085

IN THE COUNTY OF
Berrien

STATE REGISTRATION NUMBER
A0357

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: 5/31/2007	
DATE PERMIT TO INSTALL APPROVED: 10/25/2007	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

Section	Page
Alphabetical Listing of Common Abbreviations / Acronyms.....	2
General Conditions	3-4
Emission Unit Identification.....	5
Emission Unit Special Conditions	5-8
Appendix.....	9

Common Abbreviations / Acronyms

Common Acronyms		Pollutant/Measurement Abbreviations	
AQD	Air Quality Division	Btu	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
EPA	Environmental Protection Agency	gr	Grains
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallon of Applied Coating Solids	H ₂ S	Hydrogen Sulfide
GC	General Condition	hp	Horsepower
HAP	Hazardous Air Pollutant	lb	Pound
HVLP	High Volume Low Pressure *	m	Meter
ID	Identification	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	ng	Nanogram
MDEQ	Michigan Department of Environmental Quality	NOx	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM-10	Particulate Matter less than 10 microns diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (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, 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 R336.1210, 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 AQD District Supervisor shall be notified, in writing, of a change in ownership or operational control of the stationary source or emission unit(s) authorized by this Permit to Install pursuant to R336.1219. The notification shall include all of the information required by R336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R336.1219(1)(c), agreeing to and accepting the terms and conditions of this Permit to Install, and shall notify the AQD District Supervisor of any change in the contact person for this Permit to Install. **(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 nor does it affect any liability for past violations under the Natural Resources and Environmental Protection Act, 1994 PA 451.
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 R336.1301, 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 R336.1303. **(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 R336.1370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R336.2001 and R336.2003, under any of the conditions listed in R336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification
EUVULCANIZER4	Reconditioned 1193 cubic foot vulcanizer unit added for curing of rubber products.	SVVULCANIZER4
Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 to R336.1290.		

The following conditions apply to: EUVULCANIZER4

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
1.1a	VOCs	EUVULCANIZER4	1.4 tpy	12-month rolling time period as determined at the end of each calendar month.	SC 1.7 & SC 1.8	R 336.1702(a)
1.1b	Carbon tetrachloride	EUVULCANIZER4	0.0034 pph	Test Protocol ¹	SC 1.5	R 336.1225
1.1c	Carbon tetrachloride	EUVULCANIZER4	30 lbs/year	12-month rolling time period as determined at the end of each calendar month.	SC 1.7 SC 1.8, & SC 1.9	R 336.1225
1.1d	Acrolein	EUVULCANIZER4	0.0012 pph	Test Protocol ¹	SC 1.5	R 336.1225
1.1e	Acrolein	EUVULCANIZER4	11 lbs/yr	12-month rolling time period as determined at the end of each calendar month.	SC 1.7 SC 1.8, & SC 1.9	R 336.1225
1.1f	Acrylonitrile	EUVULCANIZER4	0.0017pph	Test Protocol ¹	SC 1.5	R 336.1225

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
1.1g	Acrylonitrile	EUVULCANIZER4	15 lbs/yr	12-month rolling time period as determined at the end of each calendar month.	SC 1.7, SC 1.8 & SC 1.9	R 336.1225
¹ Test Protocol shall specify averaging time.						

Material Limits

- 1.2 The permittee shall not cure more than 1,700 pounds of rubber per batch of Compounds #14 and #15 in any mixed combination nor 2000 pounds of rubber per batch of Compounds #4, #9, #12, #18, #19, and #22 in any mixed combination in EUVULCANIZER4. **(R 336.1225, R 336.1702)**
- 1.3 The permittee shall only process Compounds #4, #9, #12, #14, #15, #18, #19, and #22 Rubber materials in EUVULCANIZER4. **(R 336.1225, R 336.1702)**

Process / Operational Limits

- 1.4 The permittee shall not cure more than 52 batches larger than 850 pounds of rubber per batch of Compounds #14 and #15 in any mixed combination per 12-month rolling time period as determined at the end of each calendar month in EUVULCANIZER4. **(R 336.1225, R 336.1702)**

Testing

- 1.5 Within 90 days following receipt of written notification from the AQD District Supervisor, the permittee shall verify the acrolein, acrylonitrile, and carbon tetrachloride emission rates and emission factors by testing at owner's expense, in accordance with Department requirements. Any requested testing shall be carried out while separately curing batches of not less than 1,700 pounds each of Compound #14 Rubber and Compound #15 Rubber in EUVULCANIZER4. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.1225, R 336.2001, R 336.2003, R 336.2004)**
- 1.6 Within 60 days after approval of this Permit to Install, the permittee shall submit a report based on an investigation to determine whether full emission test reports are available supporting the U. S. Environmental Protection Agency AP-42, Draft Section 4.12 Autoclave Curing emission factors for Compound #14 Rubber and Compound #15 Rubber. Copies of any such available emission test reports shall be submitted to the Air Quality Division for review with the report. **(R 336.1225, R 336.1702)**

Recordkeeping /Reporting /Notification

1.7 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition.

(R 336.1225, R 336.1702)

1.8 The permittee shall keep the following information on a calendar month basis for EUVULCANIZER4:

- a) Total pounds of each type of rubber material cured during the calendar month.
- b) A record of the type(s) and amounts of rubber material(s) processed and the total cure duration in hours for each batch run during the month in EUVULCANIZER4 including the date for each batch.
- c) The number of batches larger than 850 pounds of Compounds #14 and #15 rubber per batch for the calendar month and per 12-month rolling time period as determined at the end of each calendar month.
- d) USEPA AP-42, Draft Section 4.12 Total Speciated Organics emission factor applicable to each type of rubber material processed in the vulcanizer.
- e) VOC (as Total Speciated Organics) mass emission calculations determining the monthly emission rate in pounds per calendar month.
- f) VOC (as Total Speciated Organics) mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702)**

1.9 The permittee shall keep the following information on a calendar month basis for EUVULCANIZER4:

- a) The emission factors for carbon tetrachloride, acrolein, and acrylonitrile applicable to Compound #14 Rubber and #15 Rubber developed from the March 2007 emission testing listed in Appendix A; and for Compounds #4, #9, #12, #18, #19, and #22 Rubber from the USEPA AP-42, Draft Section 4.12 emission factors. Revised emission factors for Compound #14 and #15 Rubber shall be determined and submitted to the District Supervisor, AQD for review and approval based on any emission testing carried out per Special Condition No. 1.5 or based on any subsequent emission testing. Upon approval by the District Supervisor the revised emission factors shall be applied thereafter to determine monthly and annual emission rates.
- b) Carbon tetrachloride, acrolein, and acrylonitrile mass emission calculations determining the monthly emission rate in pounds per calendar month for each contaminant based on the materials processed and the emission factors referenced, respectively, in Special Condition No. 1.8a and Item (a) above.
- c) Carbon tetrachloride, acrolein, and acrylonitrile mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period for each contaminant as determined at the end of each calendar month based on the materials processed and the

emission factors referenced, respectively, in Special Condition No. 1.8a and Item (a) above.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1901)**

Stack / Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
1.10	SVVULCANIZER4	2	40	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

Appendix A

Compound #14 and #15 Rubber Curing Emission Factors

Rubber Compound	Contaminant Emitted	Curing Emission Factor* (lb emitted/lb Rubber Cured)
#14	Acrolein	2.09E-05
#14	Acrylonitrile	2.98E-05
#14	Carbon Tetrachloride	5.97E-05
#15	Acrolein	2.12E-05
#15	Carbon Tetrachloride	5.45E-05

*Developed from the March 2007 emission testing results.