

SUPPLEMENT TO PERMIT NO. 336-96A

Regal Finishing, Incorporated
Coloma, Michigan

May 25, 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 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).

- 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 Department's 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
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1. The volatile organic compound (VOC) emission rate from the plastic parts coating process consisting of fifteen (15) spray paint booths and three (3) ovens, hereinafter "process" shall not exceed 84.0 pounds per hour nor 63.0 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month.
2. The acetone emission rate from the process shall not exceed 13.3 pounds per hour nor 13.5 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month.
3. The volatile organic compound (VOC) emission rate from the use of clean-up solvents shall not exceed 15.6 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month.
4. The emissions of hazardous air pollutants (HAPs) as defined pursuant to Section 112(b) of the Clean Air Act, shall be less than 8.9 tons per year for any individual HAP or 22.4 tons per year for any combination of HAPs at this stationary source. This annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month.
5. The VOC content of the coatings as applied in the process for painting plastic parts shall not exceed 5.0 pounds of VOC per gallon of coating (minus water) as applied.
6. Applicant shall keep a separate record for each calendar month of the following for the process:
 - A. For each coating sprayed, record the following on a monthly basis:
 1. The coating identification and associated coating category.
 2. The total volume used, in gallons, of each coating and reducer.
 3. The pound of VOC per gallon of each coating and reducer, as received and as applied.
 4. The coating to reducer mixing ratio.
 - B. Monthly calculation of the following for process HAPs:
 1. Monthly calculation of each individual HAP emission rate in tons per month by process
 2. Monthly calculation of aggregate HAPs emission rate in tons per month for all processes at the facility.

3. Monthly calculation for each individual HAP determining a 12-month rolling time period emission rate in tons per year.
 4. Monthly calculation of aggregate HAPs determining a 12-month rolling time period emission rate in tons per year.
- C. The total hours of operation.
- D. The amount, in gallons, of clean-up and/or purge solvents used and reclaimed.
- E. The amount, in gallons, of acetone used.

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

7. Applicant shall keep a separate record for each calendar month of the VOC and acetone emission calculations determining a calendar month emission rate in tons per month, and a 12-month rolling time period emission rate in tons per year. All records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.
8. 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, VOC content may alternatively be determined from manufacturer's formulation data.
9. Applicant shall not operate the process unless the dry filters/or wash water systems are installed and operating properly.
10. The disposal of collected waste coatings and solvents shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.
11. The exhaust gases from the process shall be discharged unobstructed vertically upwards to the ambient air at exit points as described below.
12. All coatings applied in the process shall be applied utilizing high volume low pressure (HVLP) applicators or equivalent technology with comparable transfer efficiency. All applicators shall be properly installed, maintained and operated according to manufacturer's specifications.
13. Applicant shall maintain a current listing of the manufacturer's formulation data for each coating.

Table I. (Stack Information)

STACK #	Height (ft)	Diameter (ft)
001	23	1.5
002	23	1.5
003	25	2.5
004	23	1.67
005	24	0.5
006	23	1.5
007	23	1.5
008	23	1.0
009	23	2.67
010	23	2.0
011	24	3.5
012	24	2.0
013	25	0.5
014	25	0.83
015	23	3.5
016	23	2.0
017	23	2.0
018	23	3.5