

SUPPLEMENT TO PERMIT NO. 356-96

ADRIAN FABRICATORS, INC.
412 W. Beecher St.
Adrian, Michigan

March 26, 1997

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(6)(b)(i) 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(6)(b)(ii) - 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(7) 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. Rule 219 - A new owner or operator of the process or process equipment covered by this Permit to Install shall immediately make a written request to the Department for a change of ownership or operational control. The request shall include all of the information required in Rule 219(1)(a), (b) and (c). If the request for a change in ownership or operational control is approved, the terms and conditions of this Permit to Install shall apply to the person or legal entity which hereafter owns or operates the process or process equipment for which this Permit to Install is issued. The written request shall be sent to the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909.
 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 paint dip coating process shall not exceed an average of 3.5 pounds per gallon for all coatings (minus water) as applied, based upon a 24-hour running period. The determination of this emission limit will also include solvent (diluent) addition.
14. The (VOC) emission rate from the paint dip coating process shall not exceed 13.0 pounds per hour nor 40.0 tons per year, based on a 12-month rolling time period, as determined at the end of each calendar month.
15. Visible emissions from the paint dip process shall not exceed a 6-minute average of 0 percent opacity, as measured using EPA Method 9.
16. The exhaust gases from the paint dip coating process shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 42 inches at an exit point not less than 30 feet above ground level.
17. The hazardous air pollutants (HAPs), as defined pursuant to section 112(b) of the Clean Air Act, shall have an emission rate of equal to or less than five (5.0) tons per year for any individual HAP and equal to or less than seven (7.0) tons per year for total HAPs at this facility. This annual limit shall be based upon a 12-month rolling time period, as determined at the end of each calendar month.
18. Applicant shall keep records of the paint dip coating process:
 - A. For each material, record the following on a monthly basis:
 - (1) the identification and the coating category for each coating used;
 - (2) the VOC content, in pounds per gallon (minus water), as received and as applied;
 - (3) the VOC content, in pounds per gallon, for each coating, reducer, catalyst, solvent thinners and all other VOC containing material used in the paint dip coating process;
 - (4) the content, in pounds per gallon, of each and all HAPs for all coatings, reducers, catalysts, solvent thinners and all other HAP containing material used in the paint dip coating process.
 - B. Monthly purge and clean-up solvent usage rates and disposal records. The disposal records shall reflect the volume disposed of and the percent solvent in the waste.
 - C. Monthly record of purchase orders and invoices for materials used in the paint dip coating process, excluding coatings in amounts less than two (2) gallons.
 - D. Monthly usage, in gallons, of coatings, reducers, catalysts and diluents used in the paint dip coating process.
 - E. Monthly record of the hours of operation of the paint dip coating process.

- F. Monthly calculation of the following for all HAPs:
 - (1) monthly calculation of each HAP emission rate in tons per year determined on a 12-month rolling time period.
- G. Monthly calculations of the following for VOCs:
 - (1) monthly calculation of VOC emission rate in pounds per hour for the paint dip process.
 - (2) monthly calculation of VOC emission rate in tons per year by process determined on a 12-month rolling time period.
- 19. The applicant shall calculate the aggregate HAPs emission rate in tons per year for the paint dip process described in this permit monthly, determined on a 12-month rolling time period.
- 20. The information, derived from the recordkeeping requirements, shall be kept on file for a period of at least two years and made available to the Air Quality Division and/or United States Environmental Protection Agency staff, upon request.
- 21. The VOC content, water content, density, solids weight fraction, solids volume fraction of any coating and reducer, as applied and received, shall be determined using Federal Reference Test Method 24 or other method acceptable to the Division. Upon prior approval of the District Supervisor, Air Quality Division, VOC content, water content, density, solids weight fraction, solids volume fraction of any coating and reducer may alternatively be determined from the manufacturer's formulation data.
- 22. The disposal of waste solvents and coatings shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.
- 23. All waste solvents and coatings used at this facility shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable rules and regulations.
- 24. Applicant shall maintain a current listing of the chemical composition of each coating and reducer used at the facility, including the weight percent of each compound in the coatings.
- 25. Applicant shall not substitute any coatings for those described in this permit application which would result in an appreciable change in the quality or any appreciable increase in the quantity of the emission of an air contaminant without prior notification to and approval by the Air Quality Division.
- 26. Within 60 days of the approval of this permit, the applicant will have developed and put in place the necessary systems to satisfy the recordkeeping requirements contained in this permit.