SUPPLEMENT TO PERMIT NO. 383-97 Tri-K Cylinder Service Inc. Springfield, Michigan March 31, 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

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- 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 the 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 condition of this permit to install.

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- 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

- 1. The total chrome emission from the two hard chrome plating tanks shall not exceed 0.03 milligrams per dry standard cubic meter, corrected to 70 degrees Fahrenheit and 29.92 inches Hg. This condition is necessary to assure compliance with Rule 227 and 40 CFR Part 63, Subpart N.
- 2. The applicant shall not operate the two hard chrome plating tanks unless the packed bed wet scrubber and wetting agent, hereinafter "control device", are installed and operating properly in accordance with 40 CFR Part 63, Subparts A and N.
- 3. The applicant shall not operate the two hard chrome plating tanks for more than 110 hours per calendar month. A written log of the hours of operation shall be kept on file for a period of at least two years and made available to the Department upon request. This condition is necessary to limit the facilities potential to emit pursuant to assure compliance with Rule 225.
- 4. The exhaust gases from the two hard chrome plating tanks shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 12 inches at an exit point not less than 30 feet above ground level. This condition is necessary to assure compliance with Rule 225.
- 5. Verification of total chrome emission rates from the two hard chrome plating tanks by testing, at owner's expense, in accordance with Department requirements, may be required. The testing shall be conducted within 60 days following the receipt of the written notification of the requirement. Verification of emission rates includes the submittal of a complete report of the test results. If testing is required, a complete test plan must be submitted to the Air Quality Division. The final plan must be approved by the Division prior to testing and a complete report of test results must be submitted to the Division within 60 days following the last date of testing. This condition establishes performance testing requirements pursuant to Rules 1001, 1003, and 1004.
- 6. Applicant shall perform the following inspections on the Composite Mesh Pad (CMP) system pursuant to 40 CFR Part 63, Subpart N:
 - a. Applicant shall visually inspect the CMP system on a quarterly basis to ensure there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
 - b. Applicant shall visually inspect the fan(s) at the back of the CMP on a quarterly basis to ensure that there is no breakthrough of chromic acid mist.
 - c. Applicant shall visually inspect the ductwork from the tanks to the control device on a quarterly basis to ensure there are no leaks.

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- d. Applicant shall perform wash-down's of the CMP's consistent with the manufacturers recommendations.
- 7. Applicant shall perform the following inspections on the Packed-Bed Scrubber (PBS) system pursuant to 40 CFR Part 63, Subpart N:
 - a. Applicant shall visually inspect the PBS system on a quarterly basis to ensure there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
 - Applicant shall visually inspect the back portion of the chevron blade mist eliminator on a quarterly basis to ensure that there is no breakthrough of chromic acid mist.
 - c. Applicant shall visually inspect the ductwork from the tanks to the control device on a quarterly basis to ensure there are no leaks.
 - d. Applicant shall provide make-up water to the top of the PBS consistent with the manufacturers recommendations.
- 8. The applicant shall maintain records of inspections required to comply with applicable Work Practice Standards of 40 CFR 63.342(f). Each inspection record shall identify the device inspected, the date approximate time of inspection, and a brief description of the working condition of the device during the inspection. Applicant shall also record any actions taken to correct deficiencies found during the inspection. Records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.
- 9. Applicant shall equip and maintain the control device with a pressure drop indicator. This condition is necessary to assure compliance with the emission limits which have been established pursuant to 40 CFR Part 63, Subpart N.
- 10. Applicant shall monitor and record the pressure drop across the control device in accordance with the requirements of 40 CFR Part 63, Subpart N. The frequency of monitoring shall be at least once per day. If the pressure drop across the control device varies by more than plus or minus 1 inch of water gauge from the pressure drop determined during the initial performance test, the applicant shall immediately document the variation and determine the cause of the variation, and shall immediately take corrective action.
- 11. Applicant shall maintain the surface tension of the two chromium plating tanks at 32 dynes per centimeter or less by adding chemical fume suppressant (Fumetrol 140 or equivalent) with wetting agent to the tanks, unless a different value of surface tension is approved by the District Supervisor of the Air Quality Division. This condition is necessary to assure compliance with 40 CFR Part 63, Subpart N.

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- 12. Applicant shall monitor the surface tension of the two plating tanks in accordance with 40 CFR Part 63, Subpart N. The frequency of monitoring shall be at least once each 4 hours.
- 13. The total rectifier current input to the chromium plating tanks shall not exceed 60 million amp-hr/yr based on a 12-month rolling period as determined at the end of each calendar month. The applicant shall record the rectifier current input to the chromium plating tanks at all times. All files shall be kept on file for a period of not less than two years and made available to the Air Quality Division upon request. This condition is necessary to assure compliance with the emission limits which have been established pursuant to the requirements of 40 CFR Part 63, Subpart N.
- 14. Monitoring and recording of emissions, operating and maintenance information is required to comply with the National Emission Standards for Hazardous Air Pollutants (NESHAPs) as specified in 40 CFR, Part 63, Subparts A and N. All source emissions, and operating and maintenance data shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.