# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

**NOVEMBER 2, 2005** 



# STATE REGISTRATION NUMBER N0478

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:

 10/21/2005

 DATE PERMIT TO INSTALL APPROVED:
 SIGNATURE:

 11/2/2005
 SIGNATURE:

 DATE PERMIT VOIDED:
 SIGNATURE:

 DATE PERMIT REVOKED:
 SIGNATURE:

# PERMIT TO INSTALL

Common Abbreviations/Acronyms							
Common Acronyms			Pollutant/Measurement Abbreviations				
AQD	Air Quality Division	Btu	British Thermal Unit				
ANSI	American National Standards Institute	°C	Degrees Celsius				
BACT	Best Available Control Technology	CO	Carbon Monoxide				
CAA	Clean Air Act	dscf	Dry standard cubic foot				
CEM	Continuous Emission Monitoring	dscm	Dry standard cubic meter				
CFR	Code of Federal Regulations	°F	Degrees Fahrenheit				
COM	Continuous Opacity Monitoring	gr	Grains				
EPA	Environmental Protection Agency	Hg	Mercury				
EU	Emission Unit	hr	Hour				
FG	Flexible Group	$H_2S$	Hydrogen Sulfide				
GACS	Gallon of Applied Coating Solids	hp	Horsepower				
GC	General Condition	lb	Pound				
HAP	Hazardous Air Pollutant	m	Meter				
HVLP	High Volume Low Pressure *	mg	Milligram				
ID	Identification	mm	Millimeter				
LAER	Lowest Achievable Emission Rate	MM	Million				
MACT	Maximum Achievable Control Technology	MW	Megawatts				
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram				
MAP	Malfunction Abatement Plan	NOx	Oxides of Nitrogen				
MDEQ	Michigan Department of Environmental Quality	PM	Particulate Matter				
MIOSHA	Michigan Occupational Safety & Health	PM-	Particulate Matter less than 10 microns				
MCDC	Administration	10	diameter				
MSDS	Material Safety Data Sheet	pph	Pound per hour				
NESHAP	National Emission Standard for Hazardous Air Pollutants	ppm	Parts per million				
NSPS	New Source Performance Standards	ppmv	Parts per million by volume				
NSR	New Source Review	ppmw	Parts per million by weight				
PS	Performance Specification	psia	Pounds per square inch absolute				
PSD	Prevention of Significant Deterioration	psig	Pounds per square inch gauge				
PTE	Permanent Total Enclosure	scf	Standard cubic feet				
PTI	Permit to Install	sec	Seconds				
RACT	Reasonable Available Control Technology	$SO_2$	Sulfur Dioxide				
ROP	Renewable Operating Permit	THC	Total Hydrocarbons				
SC	Special Condition Number	tpy	Tons per year				
SCR	Selective Catalytic Reduction	μg	Microgram				
SRN	State Registration Number	VOC	Volatile Organic Compounds				
TAC	Toxic Air Contaminant	yr	Year				
TEQ	Toxic Equivalent						
VE	Visible Emissions						

## **Common Abbreviations/Acronyms**

\* 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. **[R336.1201(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. **[R336.1201(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. **[R336.1201(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. [R336.1201(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. **[R336.1219]**
- 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. **[R336.1901]**
- 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 condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **[R336.1912]**
- 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.
- 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. **[R336.1301]** 
  - 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). **[R336.1370]**
- 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. **[R336.2001]**

# SPECIAL CONDITIONS

# **Emission Unit Identification**

Emission Unit ID	Emission Unit Description	Stack Identification			
EUCOAT	Steel parts pickling and phosphating line consisting of	SVCOAT			
	the following tanks: Tank 2A – cleaner 1				
	Tank 2B – cleaner 2				
	Tank 3 – hot water rinse				
	Tank 4 – hot water rinse				
	Tank 5A – sulfuric acid				
	Tank 5B – sulfuric acid				
	Tank 6 – water rinse				
	Tank 7 – hot water rinse				
	Tank 8A – phosphate				
	Tank 8AA – phosphate				
	Tank 8B – phosphate				
	Tank 9 – water rinse				
	Tank 10 – water rinse				
	Tank 11 – neutralizer				
	Tank 12A – lube				
	Tank 12B – lube				
	Tank 12C – polymer				
	Tank 12D – oil				
	Tanks 5A, 5B, 7, 8A, 8AA, and 8B are vented to a				
	wet scrubber.				
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: EUCOAT

#### **Material Usage Limits**

1.1 The monthly average hourly throughput rate for EUCOAT shall not exceed 34,000 pounds of coated parts per hour. **[R336.1225, R336.1901]** 

### Equipment

- 1.2 The permittee shall not operate EUCOAT process tanks 5A, 5B, 7, 8A, 8AA, nor 8B unless the wet scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes, but is not limited to, maintaining a pressure drop of between 0.5 and 1.5 inches, water gauge. **[R336.1225, R336.1901, R336.1910]**
- 1.3 The permittee shall not operate the EUCOAT wet scrubber unless a gauge, which measures the pressure drop across the scrubber and sounds an alarm when the pressure drop is below 0.5 inches or exceeds 1.5 inches water, is installed, maintained and operated in a satisfactory manner. **[R336.1225, R336.1901, R336.1910]**

#### Monitoring

1.4 The permittee shall monitor, in a satisfactory manner, the chemical concentrations of EUCOAT tanks 5A, 5B, 8A, 8AA, and 8B on a daily basis. **[R336.1225, R336.1901]** 

# **Recordkeeping/Reporting/Notification**

- 1.5 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the pounds of parts coated in EUCOAT, as required by SC 1.1. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **[R336.1225, R336.1901]**
- 1.6 The permittee shall keep, in a satisfactory manner, monthly records of the daily chemical concentrations for EUCOAT tanks 5A, 5B, 8A, 8AA, and 8B, as required by SC 1.4, for each day EUCOAT operates. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **[R336.1225, R336.1901]**

## **Stack/Vent Restrictions**

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement	
1.7	SVCOAT	34	34.7	R336.1225, R336.1901	
	The exhaust gases shall	ll be discharged unobstructed vertically upwards to the ambient air.			