SUPPLEMENT to PERMIT No. 59-97A Acheson Industries Port Huron, Michigan December 7, 2001

GENERAL CONDITIONS

- 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. [R 336.1201(1)]
- 2. 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, PO 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. [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 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. [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 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 R 336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. [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 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

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rule, to the District Supervisor, Air Quality Division. The notice shall be provided no 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 30 days, with the information required in this rule. [R 336.1912]

- 8. 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, PA 1994 of 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 Act 451, PA 1994, 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 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. [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 R 336.1370(2). [R 336.1370]
- 13. 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. [R 336.1201(1)]
- 14. 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. [R 336.2001]

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> SPECIAL CONDITIONS December 7, 2001 (12 Special Conditions)

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification
EU-SOLVENT_ROOM	ball mills, pebble mills, tanks, masticators	SV-100

Flexible Group Identification

Flexible Group ID	Flexible Group Description	Stack Identification
FG-FACILITY	all emission units at this facility	various

EMISSION LIMITATIONS

- 1. The volatile organic compound (VOC) emission rate from EU-SOLVENT_ROOM shall not exceed 45.5 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. [R336.1702]
- 2. The particulate toxic air contaminant emission rate from EU-SOLVENT_ROOM shall not exceed 0.10 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. [R336.1331]

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MONITORING AND RECORDKEEPING

- 3. Records of all raw materials and products used in EU-SOLVENT_ROOM, on a monthly basis, shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1702]
- 4. For each specific product the permittee shall keep records of all batch production information. This information shall include the following:
 - number of batches per month
 - number of batches per year
 - batch production duration

These records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1702]

OPERATING PARAMETERS

5. The permittee shall not operate EU-SOLVENT_ROOM unless the following controls are installed and operating properly:

installed and operating property.		
Equipment	Controls (on each individual piece)	
Ball mills	Sealed and gasketed lids	
Pebble mills	Sealed and gasketed lids	
Stationary high speed dispersing (HSD) tanks	Cooling water jackets	
	covers	
Stationary blending tanks	covers	
Stationary holding tanks	covers	
Portable tanks	covers	
Masticators not using methylene chloride	Cooling water jackets, except when heat is	
	required for process reasons.	
	Covers	
Masticators using methylene chloride	Cooling water jackets	
	covers	
	Reflux condenser (or equal or better)	

Proper installation and operation of these controls shall be determined in accordance with the Malfunction Abatement / Preventative Maintenance Plan. [R336.1702]

STACK PARAMETERS

6. The emissions from EU-SOLVENT_ROOM shall be discharged unobstructed vertically upwards from a stack with a maximum diameter of 3 feet 8 inches at an exit point not less than 60 feet above ground level. [R336.1901]

OTHER REQUIREMENTS

- 7. Within 60 days of approval of this permit, the permittee shall submit a Preventive Maintenance and Malfunction Abatement Plan for review and approval. [R336.1205]
- 8. To minimize the occurrence of malfunctions or emergencies, the permittee shall not operate EU-SOLVENT_ROOM unless the Preventive Maintenance and Malfunction Abatement Plan has been approved by the District Supervisor and is implemented by the permittee. [R336.1205]
- 9. The permittee shall keep the following records:
 - 1) For each material used, record the following on a monthly basis:
 - a) identification of each product in which it is used
 - b) VOC content (if any) by weight percent
 - c) name and weight percent of each Hazardous Air Pollutant (HAP)
 - d) amount of the material used
 - 2) Monthly clean-up solvent usage rate and disposal records
 - 3) Monthly calculation of the following for all HAP:
 - a) emission rate of each HAP, in tons per month
 - b) total HAP emissions rate, in tons per month
 - c) 12-month rolling emission rate of each HAP and total HAPs, in tons per year
 - 4) Monthly calculations of the following for VOCs:
 - a) VOC emission rate in tons per month
 - b) 12-month rolling average VOC emission rate, in tons per year [R336.1702]

FACILITY REQUIREMENTS

- 10. The emission rate of total Hazardous Air Pollutant (HAP) as defined in the federal Clean Air Act, as amended, from FG-FACILITY shall not exceed 22.5 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.
- 11. The emission rate of each Hazardous Air Pollutant (HAP) as defined in the federal Clean Air Act, as amended, from FG-FACILITY shall not exceed 9 tons per year based on a

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12-month rolling time period as determined at the end of each calendar month.

12. The volatile organic compound and criteria pollutants (NOx, SO₂, CO, lead) emission rate from FG-FACILITY shall not exceed 89 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.