

SUPPLEMENT TO PERMIT NO. 226-98

Trendway Corporation
Holland, Michigan 49424

July 10, 2001
SRN: B7098

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 condition 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 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 this 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 special condition of this permit to install.
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*****

Laminator Operation

16. The methylene chloride emissions from the adhesives application operations shall not exceed 0.2 parts per million by volume.

17. The volatile organic compound (VOC) emission rate from the adhesives application operation shall not exceed 8.23 pounds per hour, nor 17.12 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.
18. Applicant shall not operate the panel brush cleaner and edge trimmer operations unless the baghouse is operating properly.
19. The exhaust gases from the panel brush cleaner and edge trimmer operations shall be discharged unobstructed vertically upwards to the ambient air from a stack with a rectangular size of 18 inches by 24 inches at an exit point not less than 17 feet above ground level.
20. The particulate emission from the lamination process shall not exceed 0.10 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis.

Five Spray Booths

21. The VOC emission rate from the five spray booths shall not exceed 3.1 pounds per hour nor 13.4 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. These booths at time of permit issuance are known as:
 1. Plastic/fabric adhesive booth, west building;
 2. Adhesive spray booth, T-wall west;
 3. Adhesive spray booth, T-wall east;
 4. Tack board adhesive spray booth;
 5. Wet paint booth.
22. Applicant shall not operate a spray booth unless its particulate filters are in place and operating properly.

Three Chair Assembly Spray Booths

23. The VOC emission rate from the three adhesive spray booths shall not exceed 8 pounds per hour nor 11 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. These limits are based upon maximum coating usage rates of 1.5 gallons per hour and 4,000 gallons per year.
24. The exhaust gases from the three adhesive spray booths shall be discharged unobstructed vertically upwards to the ambient air from three stacks each with a maximum diameter of 24 inches at an exit point not less than 28 feet above ground level.
25. Applicant shall not operate a spray booth unless its exhaust filters are in place and operating properly.

Powder Coat Line

26. The particulate emission from each powder coating spray booth shall not exceed 0.01 pound per 1,000 pounds of exhaust gasses, calculated on a dry gas basis.
27. The particulate emission from the rack burn-off oven shall not exceed 0.10 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis.
28. Applicant shall not operate each powder coating spray booth unless the appropriate cartridge filter collector and safety monitoring filter system are installed and operating properly.
29. Applicant shall not operate the rack burn-off oven unless the afterburner is installed and operating properly.
30. Applicant shall equip and maintain each safety monitoring filter system with an alarm that will trip upon failure of the associated cartridge filter.
31. Applicant shall not operate the rack burn-off oven unless a minimum temperature of 1400 degrees Fahrenheit and a minimum retention time of 0.55 second in the afterburner is maintained.
32. Applicant shall not operate the rack burn-off oven unless it is equipped with a properly operating thermocouple control system and temperature indicator for the afterburner.

Woodworking Operations

33. The particulate emissions from Woodworking Operations I shall not exceed 0.01 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis.
34. Applicant shall not operate the woodworking operation I, unless the baghouse is installed and operating properly.

Woodworking Operations II

35. The particulate emissions from the Woodworking Operations II shall not exceed 0.10 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis.
36. Applicant shall not operate the Woodworking Operations II, unless the baghouse is installed and operating properly.

Woodsanding Operations

37. The particulate emissions from the Woodsanding Operations shall not exceed 0.036 pound per 1,000 pounds of exhaust gases, calculated on a dry gas basis.
38. Visible emissions from the Woodsanding Operations shall not exceed a 6-minute average of 10% opacity.

39. Applicant shall not operate the Woodsanding Operation, unless the baghouse is installed and operating properly.

Stationary Source-Wide Conditions

40. The emissions of hazardous air pollutants (HAPs), as defined pursuant to Section 112(b) of the Clean Air Act, shall be less than 10 tons per year for any individual HAP or less than 25 tons per year for any combination of HAP's at this stationary source. These annual limits shall be based upon a 12-month rolling time period as determined at the end of each calendar month. This recordkeeping shall be done on an emissions group basis and also a combined total for the entire stationary source.

Recordkeeping Requirements

41. Applicant shall develop and implement a Preventative Maintenance Plan (PMP) for the facility. At a minimum this plan shall address the preventative maintenance of the baghouses associated with the woodworking processes. Acceptable plans and any modifications shall be submitted to the AQD District Supervisor.
42. Applicant shall maintain the following records and emission calculations for the stationary source:
- a. The identity of each coating or solvent used in the facility and the coating category to which it belongs;
 - b. The VOC content of each coating or solvent used in the facility, in pounds per gallon with water, as received;
 - c. The VOC content of each coating used in the facility, in pounds per gallon minus water, as applied;
 - d. The monthly usage rate in gallons for each coating or solvent used in the Laminator Operation, the Five Spray Booths and the Three Chair Assembly Spray Booths;
 - e. The monthly average VOC emissions in pounds per gallon, minus water, as applied, separately for each coating category identified above;
 - f. The HAP content of each coating or solvent used at the stationary source, including grandfathered and exempt sources for each individual HAP and for all HAPs in aggregate;
 - g. Individual and aggregate HAP mass emission calculations determining the yearly emission rates in tons per 12-month rolling time period as determined at the end of each calendar month from the stationary source, including grandfathered and exempt sources;
 - h. Total VOC mass emission calculations determining the yearly emission rates in tons per 12-month rolling time period as determined at the end of each calendar month from the stationary source, including grandfathered and exempt sources.
43. The applicant shall prepare a summary report of these records each calendar quarter in a format acceptable to the AQD District Supervisor. This information shall be kept on file for a period of at least five years and made available to the Air Quality Division and/or the United States Environmental Protection Agency staff upon request.

