MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

September 3, 2004

NEW SOURCE REVIEW PERMIT TO INSTALL

No. 109-99A

ISSUED TO

K C Jones Plating Division

LOCATED AT

321 West Ten Mile Road Hazel Park, Michigan 48030

IN THE COUNTY OF

Oakland

STATE REGISTRATION NUMBER B7773

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 Part 5505(1) of Article II, Chapter I, Part 55 (Air Pollution Control) of P.A. 451 of 1994. 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:				
8/9/2004				
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:			
9/3/2004				
DATE PERMIT VOIDED:	SIGNATURE:			
DATE PERMIT REVOKED:	SIGNATURE:			

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	NOx	Oxides of Nitrogen	
MAP	Malfunction Abatement Plan	PM	Particulate Matter	
MDEQ	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns diameter	
MIOSHA	Michigan Occupational Safety & Health Administration	pph	Pound per hour	
MSDS	Material Safety Data Sheet	ppm	Parts per million	
NESHAP	National Emission Standard for Hazardous Air Pollutants	ppmv	Parts per million by volume	
NSPS	New Source Performance Standards	ppmw	Parts per million by weight	
NSR	New Source Review	psia	Pounds per square inch absolute	
PS	Performance Specification	psig	Pounds per square inch gauge	
PSD	Prevention of Significant Deterioration	scf	Standard cubic feet	
PTE	Permanent Total Enclosure	sec	Seconds	
PTI	Permit to Install	SO_2	Sulfur Dioxide	
RACT	Reasonable Available Control Technology	THC	Total Hydrocarbons	
ROP	Renewable Operating Permit	tpy	Tons per year	
SC	Special Condition Number	μg	Microgram	
SCR	Selective Catalytic Reduction	VOC	Volatile Organic Compounds	
SRN	State Registration Number	yr	Year	
TAC	Toxic Air Contaminant			
VE	Visible Emissions			

^{*} 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 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 R336.1219 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 R336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. [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 conditions or malfunction has been corrected, or within 30 days of discovery of 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

Flexible Group Identification

Flexible Group ID	Emission Units Included in Flexible Group	Stack Identification
FG-KOLENELINE	Kolene process line, consisting of the following	SV-S1-KOLENE
	equipment. Emissions from tanks 301 through 311	
	are exhausted through the Kolene scrubber, a	
	packed bed scrubber with a mist eliminator.	
	Pre-wash, tank 301; flowing rinse, tank 302;	
	hot rinse, tank 303; pre-heat, tanks 304 and 304A;	
	Nu-tride bath, tank 305 and backup tank 305A;	
	KG-500 bath, tank 306; flowing rinse, tank 307;	
	hot rinse, tank 308; post wash, tank 309;	
	cold rinse, tank 310; hot rinse, tank 311; and	
	oil, tank 312.	

The following conditions apply to: FG-KOLENELINE

Description: Kolene process line, consisting of the following equipment. Emissions from tanks 301 through

311 are exhausted through the Kolene scrubber, a packed bed scrubber with a mist eliminator.

Pre-wash, tank 301; flowing rinse, tank 302; hot rinse, tank 303;

pre-heat, tanks 304 and 304A; Nu-tride bath, tank 305 and backup tank 305A;

KG-500 bath, tank 306; flowing rinse, tank 307; hot rinse, tank 308; post wash, tank 309;

cold rinse, tank 310; hot rinse, tank 311; and oil, tank 312.

Process/Operational Limits

1.1 Within 90 days of the date this permit is issued, the permittee shall submit to the AQD District Supervisor, for review and approval, a malfunction abatement plan (MAP) for tanks 305 and 305A. The permittee shall not operate FG-KOLENELINE unless the approved MAP, or an alternate plan approved by the AQD District Supervisor, is implemented and maintained. The plan shall include procedures for maintaining and operating in a satisfactory manner, tanks 305 and 305A, add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the malfunction abatement plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the malfunction abatement plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor. [R336.1901, R336.1910]

Equipment

- 1.2 The permittee shall not operate FG-KOLENELINE unless the Kolene scrubber and mist eliminator are installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the pH of the scrubber solution bebw 9.5 at the inlet to the Kolene scrubber, and maintaining a pressure drop across the packed bed within the range recommended by the manufacturer. The permittee may use an alternate pressure drop range upon receipt of written approval from the AQD District Supervisor. [R336.1224, R336.1910]
- 1.3 The permittee shall equip and maintain the Kolene scrubber with a device that indicates the pH of the scrubber solution at or before the inlet to the scrubber and a device that reads the pressure drop across the packed bed. [R336.1910]

1.4 The permittee shall operate FG-KOLENELINE in such a way that only tank 305 or tank 305A contains process materials or is operating at any time. [R336.1201, R336.1224, R336.1225]

Monitoring

1.5 The permittee shall monitor and record, in a satisfactory manner, the pH of the scrubber solution and the pressure drop across the packed bed of the Kolene scrubber at least once during each shift that FG-KOLENELINE operates. [R336.1910]

Recordkeeping/Reporting/Notification

- 1.6 The permittee shall keep, in a satisfactory manner, the following records for each shift that FG-KOLENELINE operates, as required by SC 1.5. The permittee shall keep all these records on file for a period of at least five years and make them available to the Department upon request. [R336.1910]
 - a. The scrubber solution pH for the Kolene scrubber
 - b. The pressure drop across the packed bed of the Kolene scrubber
- 1.7 The permittee shall keep records of the following for FG-KOLENELINE:
 - a. The hourly number of parts processed.
 - b. The monthly hours of operation.
 - c. For each shift that FG-KOLENELINE operates, whether tank 305 or tank 305A is in use. If both tanks are used during any shift, during what time periods each tank operates.
 - d. The identification, composition, and monthly quantities of each make-up material added to FG-KOLENELINE.

The records shall be kept in a format acceptable to the AQD District Supervisor. The permittee shall keep all these records on file for a period of at least five years and make them available to the Department upon request. [R336.1225]

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Cross Sectional Area (square inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement		
1.8a	SV-S1-KOLENE	1037	45	R336.1225		
	The exhaust gases shall be discharged unobstructed vertically unwords to the embient air					

The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air. Additional text, descriptions, stack/vent conditions, etc. as needed.