MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

September 16, 2008

PERMIT TO INSTALL

No. 377-99A

ISSUED TO

L&L Products, Incorporated

LOCATED AT

159 McLean Drive Romeo, Michigan 48065

IN THE COUNTY OF

Macomb

STATE REGISTRATION NUMBER

N5718

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: 8/28/2008					
DATE PERMIT TO INSTALL APPROVED: 9/16/2008	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	СО	Carbon Monoxide	
CAA	Clean Air Act	dscf	Dry standard cubic foot	
CEM	Continuous Emission Monitoring	dscm	•	
CFR	5		Degrees Fahrenheit	
СОМ	Continuous Opacity Monitoring	gr	Grains	
EPA	Environmental Protection Agency	Hg	Mercury	
EU	Emission Unit	hr	Hour	
FG	Flexible Group	H ₂ S	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		Megawatts	
IVIAOT	Technology	MW	Megawatts	
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram	
MAP	Malfunction Abatement Plan	NO_x	Oxides of Nitrogen	
MDEQ	Michigan Department of Environmental Quality		Particulate Matter	
MIOSHA	Michigan Occupational Safety & Health Administration	PM- 10	Particulate Matter less than 10 microns diameter	
MSDS	Material Safety Data Sheet	pph	Pound per hour	
NESHA	National Emission Standard for		•	
Р	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	Reasonably Available Control Technology	SO ₂	Sulfur Dioxide	
ROP	Renewable Operating Permit	THC	Total Hydrocarbons	
SC	Special Condition	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	Toxicity Equivalence Quotient			
VE	Visible Emissions			

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* 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. (R 336.1201(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. (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 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 R 336.1219. The notification shall include all of the information required by R 336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R 336.1219(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. (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 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). (R 336.1912)

- 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 nor does it affect any liability for past violations under the Natural Resources and Environmental Protection Act, 1994 PA 451.
- 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 R 336.1301, 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 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. The Department may require the permittee to conduct acceptable performance tests, at the permittee'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)

SPECIAL CONDITIONS

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification			
EUPROCESS	Mixer #7 (Asset 874) and two screw extruders	NA			
	(Twin B170 - Asset 856 and Twin B171 - Asset				
	1081). Plastic and rubber specialty compounds				
	process with two dust collector control devices				
	(one controlling mixer #7 and one controlling the				
	Twin B170 and Twin B171 screw extruders).				
Changes to the equipment described in this table are subject to the requirements of R 336.1201,					
except as allowed by R 336.1278 to R 336.1290.					

The following conditions apply to: EUPROCESS

Description: Mixer #7 (Asset 874) and two screw extruders (Twin B170 - Asset 856 and Twin B171 - Asset 1081)

Flexible Group ID: NA

Pollution Control Equipment: Two dust collector control devices (one controlling mixer #7 and one controlling the Twin B170 and Twin B171 screw extruders)

Emission Limits

	Sion Linits					
	Pollutant	Limit	Time Period	Equipment	Testing/ Monitoring Method	Applicable Requirement
1.1a	PM	0.10 lb per 1,000 lbs of exhaust gas	According to method	EUPROCESS (mixer #7 dust collector)	GC 13	R 336.1331
1.1b	PM	0.10 lb per 1,000 lbs of exhaust gas	According to method	EUPROCESS (screw extruders dust collector)	GC 13	R 336.1331
1.1c	PM	0.1 pph	According to method	EUPROCESS (mixer #7 dust collector)	GC 13	R 336.1331
1.1d	PM	0.1 pph	According to method	EUPROCESS (screw extruders dust collector)	GC 13	R 336.1331
1.1e	VOC	9.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUPROCESS	SC 1.6	R 336.1702(a)

Equipment

- 1.2 The permittee shall not operate the mixer #7 portion of EUPROCESS unless the associated dust collector is installed, maintained, and operated in a satisfactory manner. (R 336.1331, R 336.1901, R 336.1910)
- 1.3 The permittee shall not operate the screw extruder portion of EUPROCESS unless the associated dust collector is installed, maintained, and operated in a satisfactory manner. (R 336.1331, R 336.1901, R 336.1910)
- 1.4 The permittee shall equip and maintain each EUPROCESS dust collector with a triboelectric sensor. The triboelectric sensor shall be equipped with a visual alarm that activates when the particulate matter concentration reaches a level equal to five times the baseline value. The baseline value shall be calibrated when no material addition operations are being conducted. Corrective action shall be taken in response to an alarm. (R 336.1331, R 336.1901, R 336.1910)

Recordkeeping/Reporting/Notification

- 1.5 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1331, R 336.1702(a), R 336.1910)
- 1.6 The permittee shall calculate the VOC emission rate from EUPROCESS monthly, for the preceding 12-month rolling time period, using a method acceptable to the AQD District Supervisor. 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. (R 336.1702(a))
- 1.7 The permittee shall record the time and duration of any event activating a triboelectric sensor alarm described in SC 1.4. This record shall include the corrective action taken in response to the alarm. 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. (R 336.1331, R 336.1901, R 336.1910)
- 1.8 The permittee shall keep, in a satisfactory manner, monthly records of the raw material usage and processing rate for EUPROCESS. 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. (R 336.1702(a), R 336.1901)