

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

September 17, 2012

PERMIT TO INSTALL
449-99B

ISSUED TO
Red Spot Westland, Inc.

LOCATED AT
550 South Edwin Street
Westland, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
B5642

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:

July 23, 2012

DATE PERMIT TO INSTALL APPROVED:

September 17, 2012

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO ₂ e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	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
GHGs	Greenhouse Gases	kW	Kilowatt
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	Malfuction Abatement Plan	NO _x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM less than 10 microns diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM less than 2.5 microns diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO ₂	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* 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 48909-7760, 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 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 and 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 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.
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 SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUCTG01	Coating manufacturing in open-top mixing tanks and associated equipment including mills, dispersers, container cleaning, and quality control activities.	FGCOATING
EUCTG02	Coating manufacturing in closed totes and associated equipment including mills, dispersers, container cleaning, and quality control activities. This emission unit also includes Closed Loop Tanks #1, #2, and #4.	FGCOATING
EURESIN	Water-borne resin manufacturing in a reactor with an expansion tank and associated equipment.	FGCOATING
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.		

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGCOATING	Coating and resin manufacturing	EUCTG01, EUCTG02, EURESIN
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply to: FGCOATING

DESCRIPTION: Coating and resin manufacturing

Emission Units: EUCTG01, EUCTG02, EURESIN

POLLUTION CONTROL EQUIPMENT: Covered vessels, Baghouse, Expansion tank

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	38 tpy	12-month rolling time period as determined at the end of each calendar month	EUCTG01 and EURESIN combined	SC VI.2	R 336.1225, R 336.1702(a), R 336.1901
2. PM	0.01 lb per 1,000 lbs of exhaust gas	Test Protocol*	FGCOATING Baghouse	GC 13	R 336.1205(3), R 336.1225, R 336.1331, R 336.1901
3. PM10	0.9 pph	Test Protocol*	FGCOATING Baghouse	GC 13	R 336.1205(3), R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) & (d)
4. Styrene	68 pounds per month	Monthly	EURESIN	SC VI.3	R 336.1225

*Test Protocol shall specify averaging time

II. MATERIAL LIMITS

- The annual combined coating and resin material limit for EUCTG01 and EURESIN shall not exceed the limit expressed below per 12-month rolling time period as determined at the end of each calendar month: **(R 336.1702(a))**

$$\sum_{12\text{ months}} \left(\sum_i (U_i \times V_i) \times 0.0125 \right) \leq 76,000 \text{ pounds}$$

U_i = gallons of coating/resin i produced during the calendar month
 V_i = VOC content of coating/resin i in pounds of VOC per gallon

- The total annual coating and resin material limit for FGCOATING shall not exceed the limit expressed below per 12-month rolling time period as determined at the end of each calendar month: **(R 336.1702(a))**

$$\sum_{12\text{ months}} \left(\sum_i (U_i \times V_i) \times 0.0125 + \sum_j (A_j \times B_j) \times 0.0029 \right) \leq 110,000 \text{ pounds}$$

U_i = gallons of coating/resin i produced in EUCTG01 or EURESIN during the calendar month
 V_i = VOC content of coating/resin i produced in EUCTG01 or EURESIN in pounds of VOC per gallon
 A_j = gallons of coating j produced in EUCTG02 during the calendar month
 B_j = VOC content of coating j produced in EUCTG02 in pounds of VOC per gallon

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate FGCOATING unless all applicable provisions of Rule 630 are met. **(R 336.1630, R 336.1702(a) and (d))**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate the solids charging portions of FGCOATING unless the baghouse is installed, maintained, and operated in a satisfactory manner. **(R 336.1225, R 336.1331, R 336.1910, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. 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 monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702, R 336.1901)**
2. The permittee shall keep a record of the following for FGCOATING:
 - a) Volume of each coating and resin produced on a monthly basis.
 - b) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
 - c) The methods used for the above calculations.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. **(R 336.1225, R 336.1702, R 336.1901)**

3. The permittee shall calculate the styrene emission rates from EURESIN for each calendar month using a method acceptable to the AQD District Supervisor. **(R 336.1225)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV004	20	38	R 336.1225, R 336.1901
2. SV005	20	32	R 336.1225, R 336.1901
3. SV006	18	25	R 336.1225, R 336.1901
4. SV007	20	32	R 336.1225, R 336.1901
5. SV009	18	28	R 336.1225, R 336.1901
6. SV010	16	43	R 336.1225, R 336.1901
7. SV011	20	38	R 336.1225, R 336.1901
8. SV015	16	43	R 336.1225, R 336.1901
9. SV016	18	25	R 336.1225, R 336.1901
10. SV017	29	23	R 336.1225, R 336.1901
11. SV018	18	25	R 336.1225, R 336.1901

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT: Covered vessels, Baghouse, Expansion tank

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	25 pph	Hourly (Based on a daily average per SC VI.2)	FGFACILITY	SC VI.2, VI.3	R 336.1225, R 336.1901
2. VOC	55 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)
3. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)
4. Aggregate HAPs	Less than 22.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.3	R 336.1205(3)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall equip any new coating mixing tanks at FGFACILITY with covers that completely cover all openings except for those which are no larger than necessary to allow safe clearance for the mixer shaft. The permittee shall cover all openings at all times except when operator access is necessary and shall keep all solvent containers closed when not in use. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**
2. The permittee shall equip and maintain any new coating mixing tanks it wishes to install at FGFACILITY with covers that achieve VOC emissions control comparable to the closed totes that are part of EUCTG02. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. 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 monitoring/recordkeeping special condition. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall monitor, in a satisfactory manner, the daily average VOC pound per hour emission rate calculated from monthly production records, prorated to a daily rate. Should the prorated daily average emission rate exceed 80 percent of the daily average pound per hour limit, the permittee shall commence daily production recordkeeping for a minimum of three months until the prorated hourly rate falls below 80 percent of the daily average pound per hour limit as calculated at the end of the month. **(R 336.1205, R 336.1225, R 336.1901)**
3. The permittee shall keep, in a satisfactory manner, the following records for FG FACILITY. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(3), R 336.1225, R 336.1702(a), R 336.1901)**
 - a) The hours of operation on a monthly basis,
 - b) Hours of operation on a daily basis (as needed to comply with provisions of SC VI.2),
 - c) VOC emission rate in pounds per hour (based on a daily average as stated in SC VI.2),
 - d) Monthly and 12-month rolling time period VOC and HAP emission rates,
 - e) Formulations of each product, including VOC and HAP content,
 - f) Volume of each product produced on a monthly basis,
 - g) Volume of each product produced on a daily basis (as needed to comply with provisions of SC VI.2),
 - h) The methods used for the above calculations, and
 - i) A list of all equipment installations and modifications made to FG COATING kept for the life of the equipment.

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).