MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

May 24, 2004

NEW SOURCE REVIEW PERMIT TO INSTALL

No. 80-03

ISSUED TO

March Coatings, Inc.

LOCATED AT 160 Summit Street Brighton, Michigan 48116

IN THE COUNTY OF Livingston

STATE REGISTRATION NUMBER N2497

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: 5/13/2004				
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:			
5/24/2004				
DATE PERMIT VOIDED:	SIGNATURE:			
DATE PERMIT REVOKED:	SIGNATURE:			

PERMIT TO INSTALL

Table of Contents

Section	Page
Alphabetical Listing of Common Abbreviations / Acronyms	2
General Conditions	3
Emission Unit Identification	5
Emission Unit Special Conditions	5

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	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		
SC	Special Condition Number	tpy	Tons per year		
SCR	Selective Catalytic Reduction	μg	Microgram		
SRN	State Registration Number	VOC	Volatile Organic Compounds		
TAC	Toxic Air Contaminant	yr	Year		
VE	Visible Emissions				

Common Abbreviations / Acronyms

* 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 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

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification		
EUBURNOFF	SEGHERS Fluid Clean Fluidized Bed Type	SVBURNOFF		
	B18.08.05 cleaning furnace for removal of			
	coating residues from metal tools, parts and			
	fixtures. Emission controls include a furnace			
	afterburner zone and a cyclone separator.			
Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed				
by R336.1278 to R336.1290.				

The following conditions apply to: EUBURNOFF

Emission Limits

1.1 Visible emissions from EUBURNOFF shall not exceed a six-minute average of five percent opacity. [R336.1301]

Material Usage Limits

- 1.2 The permittee shall burn only natural gas in EUBURNOFF. **[R336.1901]**
- 1.3 The permittee shall not process any material in EUBURNOFF other than cured paints, oil or grease on metal parts, racks and/or hangers. No rubber, plastics, uncured paints, or any other materials containing sulfur or halogens (chlorine, fluorine, bromine, etc.) such as plastisol, polyvinyl chloride (PVC), or Teflon may be processed in EUBURNOFF. **[R336.1224, R336.1225, R336.1901]**

Process/Operational Limits

- 1.4 The permittee shall not load any transformer cores, which may be contaminated with PCB-containing dielectric fluid, wire or parts coated with lead or rubber, or any waste materials such as paint sludge or waste powder coatings into EUBURNOFF. **[R336.1224, R336.1225, R336.1901]**
- 1.5 The permittee shall not operate EUBURNOFF unless the afterburner zone is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the afterburner zone includes maintaining a minimum temperature of 1100°F and a minimum retention time of 1.6 seconds. **[R336.1224, R336.1225, R336.1301, R336.1901, R336.1910]**
- 1.6 The permittee shall not operate EUBURNOFF unless the cyclone separator is installed and operating properly. **[R336.1224, R336.1225, R336.1301, R336.1901, R336.1910]**
- 1.7 The permittee shall not operate EUBURNOFF unless the sand bed is preheated to 850 F before parts are loaded into the sand bed for processing. **[R336.1224, R336.1225, R336.1301, R336.1901, R336.1910]**

Equipment

- 1.8 The permittee shall equip and maintain EUBURNOFF with an automatic temperature control system for the furnace. **[R336.1224, R336.1225, R336.1301, R336.1901, R336.1910]**
- The permittee shall equip and maintain EUBURNOFF with an interlock system that shuts down the furnace when the automatic temperature control system for the furnace is not operating properly. [R336.1224, R336.1225, R336.1301, R336.1901, R336.1910]

Monitoring

- 1.10 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature in the afterburner zone on a continuous basis. **[R336.1224, R336.1225, R336.1901, R336.1910]**
- 1.11 The permittee shall calibrate the thermocouples associated with the sand bed and afterburner zone at least once per year. **[R336.1224, R336.1225, R336.1901, R336.1910]**

Recordkeeping/Reporting/Notification

- 1.12 All records shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. [R336.11224, R336.1225, R336.1901, R336.1910]
- 1.13 The permittee shall keep, in a satisfactory manner, continuous temperature data records for the EUBURNOFF afterburner zone. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1224, R336.1225, R336.1901, R336.1910]**
- 1.14 The permittee shall keep, in a satisfactory manner, records of the date, duration, and description of any malfunction of the control equipment, any maintenance performed and any testing results for EUBURNOFF. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1910, R336.1912]**
- 1.15 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material being removed from the parts being processed in EUBURNOFF. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1224, R336.1225, R336.1901]**

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement				
1.16	SVBURNOFF	14	45	R336.1225, R336.1901				
				40 CFR 52.21 (c) & (d)				
	The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.							
	Additional text, descriptions, stack/vent conditions, etc. as needed.							