MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

JANUARY 10, 2006

PERMIT TO INSTALL
NO. 57-04A

ISSUED TO
CHRISTENSEN FIBERGLASS, LLC

LOCATED AT 126 ANILINE AVENUE HOLLAND, MICHIGAN 49424

> IN THE COUNTY OF OTTAWA

STATE REGISTRATION NUMBER N5883

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 R	EQUIRED BY RULE 203:
12/21/2005	
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:
1/10/2006	
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

ERMIT TO INSTALL

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Common Abbreviations / Acronyms

		ations / 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					
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit					
EPA	Environmental Protection Agency	gr	Grains					
EU	Emission Unit	Hg	Mercury					
FG	Flexible Group	hr	Hour					
FRP	Fiberglass Reinforced Plastic	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					
MMA	Methyl Methacrylate	PM	Particulate Matter					
MAP	Malfunction Abatement Plan	PM-10	Particulate Matter less than 10 microns diameter					
MDEQ	Michigan Department of Environmental Quality	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					
RTM	Resin Transfer Molding	μg	Microgram					
SC	Special Condition Number	VOC	Volatile Organic Compounds					
SCR	Selective Catalytic Reduction	yr	Year					
SRN	State Registration Number							
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 condition 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

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification
EULAMINATION	Resin lamination process to construct miscellaneous rigid	SV-FIBERGLASS
	products. Resin materials are hand-applied (manual) and	
	mechanically applied. The resin application will occur in	
	the production area and/or booth vented by the booth	
	exhaust system. Hardener/catalyst materials may be	
	used; emissions included here. Mold release materials	
	may be used; emissions included here.	
EUGELCOAT	Gelcoat materials applied to molds. Air atomized	SV-FIBERGLASS
	applicators are used for gelcoat application. The gelcoat	
	application will occur in the production area and/or booth	
	vented by the booth exhaust system. Catalyst materials	
	may be used; emissions included here.	
EUCLEANUP	Acetone used for cleanup of processes.	SV-FIBERGLASS
Changes to the equipme	nt described in this table are subject to the requirements of R	336.1201, except as
allowed by D336 1278 t	o D326 1200	•

allowed by R336.1278 to R336.1290.

Flexible Group Identification

Flexible Group ID	Emission Units Included in Flexible Group	Stack Identification
FGFIBERGLASS	EULAMINATION, EUGELCOAT, EUCLEANUP	SV-FIBERGLASS

The following conditions apply to: EULAMINATION

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
1.1	VOC (including styrene)	EULAMINATION	5.9tpy	12-month rolling time period as determined at the end of each	SC 1.8	R336.1225, R336.1702(a)
	TD1 : :	 		calendar month.	N. 1.0	1 1 21 1

The emission limits are based upon the emission factors in Special Condition No. 1.2a and 1.2b and includes molds release..

	Material	Application Method	Styrene Emission Factor (lb emitted per lb material applied)
1.2a	Resin	Manual-Atomized	0.177
1.2b	Resin	Manual	0.090

The emission factor listed is for a worst case 50 percent styrene content resin. The emission factor will vary depending on the styrene content of the resin. Refer to the Unified Emission Factor (UEF) Table in Appendix A for addition emission factors. [R336.1225, R336.1702(a)]

Material Usage Limits

1.3 The styrene content of all resins used in EULAMINATION shall not exceed 50 percent by weight. [R336.1225, R336.1702(a)]

Equipment

- 1.4 The permittee shall not operate EULAMINATION unless its respective exhaust filter is installed, maintained and operated in a satisfactory manner. [R336.1225, R336.1702(a), R336.1901]
- 1.5 The permittee shall not operate EULAMINATION unless the resin application is in the production area vented through the booth or the booth, and the booth exhaust fan is operating in a satisfactory manner during resin application. [R336.1225, R336.1702(a), R336.1901]

Recordkeeping/Reporting/Notification

- 1.6 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them 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. [R336.1225, R336.1702]
- 1.7 The permittee shall keep a separate record of the VOC and styrene monomer content for each shipment of resin received. The permittee shall keep all records on file for a period of at least five years and made available to the Department upon request. [R336.1225, R336.1702(a)]
- 1.8 The permittee shall keep the following information for each calendar month for EULAMINATION:
 - a) The identity and amount (in pounds) of each resin used.
 - b) The VOC (including styrene) content of each resin used.
 - c) The identity and amount (in pounds) of each catalyst/hardener used.
 - d) The identity and amount (in pounds) of mold release used.
 - d) The appropriate emission factor for each raw material used.
 - e) The appropriate emission factor for each raw material used.
 - f) VOC (including styrene) emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. [R336.1225, R336.1702(a)]

1.9 The permittee shall keep, in a satisfactory manner, records of weekly fan operational checks for EULAMINATION, as required by SC 1.5. The permittee shall keep all records on file for a period of at lease five years and make them available to the Department upon request. [R336.1225,R336.1702(a),R336.1901]

The following conditions apply to: EUGELCOAT

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
2.1	VOC(Including styrene)	EUGELCOAT	1.9 tpy	12-month rolling time period as determined at the end of each calendar month.	SC 2.8	R336.1225, R336.1702(a)
	The emission lim	its are based upon th	e emission fa	ctors in Special Cond	dition Nos. 2.2a,	2.2b, and 2.2c.

	Material	Application Method	Styrene Content (wt %)	MMA Content (wt %)	Styrene Emission Factor (lb emitted per lb material applied)	MMA Emission Factor (lb emitted per lb material applied)
2.2a	Gelcoat	Atomized	43	5	0.251	0.038
	(clear,					
	white,					
	colored,					
	tooling)					
2.2b	Sanding	Atomized	16.5	NA	0.073	NA
	Primer					
	(non-					
	gelcoat)					
2.2c	Speed	Atomized	51	NA	0.334	NA
	Patchaid					
	(non-					
	gelcoat)					

The emission factors listed are for worst case styrene and MMA content gelcoats. The emission factors will vary depending on the styrene and MMA contents of the gelcoats. Refer to the Unified Emission Factor (UEF) Table for further information. [R336.1225, R336.1702(a)]

NOTE: The Patch Reducer and Speed Patchaid are not gelcoat materials but they do contain styrene. The emissions of styrene from these materials are treated as gelcoats for purposes of estimating emissions. The appropriate UEF factor should be used when estimating styrene emissions. Other VOC emissions are assumed to be 100% emitted.

Material Usage Limits

2.3 The permittee shall not exceed the styrene the MMA monomer contents listed in Special Condition Nos. 2.2aa, 2.2b. and 2.2c for materials used in EUGELCOAT. [R336.1225, r336.1702(a)]

Equipment

- 2.4 The permittee shall not operate EUGELCOAT unless its respective exhaust filter is installed, maintained and operated in a satisfactory manner. [R336.1301, R336.1331, R336.1901, R336.1910]
- 2.5 The permittee shall not operate EUGELCOAT unless the gelcoat application is in the production area vented through the booth, and the booth exhaust fan is operating in a satisfactory manner during gelcoat application. [R336.1301, R336.1331, R336.1901]

Recordkeeping/Reporting/Notification

- 2.6 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them 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. [R336.1225, R336.1702(a)]
- 2.7 The permittee shall keep a separate record of the styrene, and MMA monomer contents for each shipment of gelcoat received. The permittee shall keep a file for a period of at least five years and made available to the Department upon request. [R336.1225, R336.1702(a)]
- 2.8 The permittee shall keep the following information for each calendar month for EUGELCOAT:
 - a) The identity and amount (in pounds) of each material used.
 - b) The styrene, MMA and VOC content of each material used.
 - c) The appropriate emission factor for each raw material used.
 - d) VOC (including styrene) emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and made available to the Department upon request. [R336.1225, R336.1702(a), R336.1901]

2.9 The permittee shall keep, in a satisfactory manner, records of weekly fan operational checks for EUGELCOAT, AS REQUIRED BY SC 2.5. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. [R336.1225, R336.1702(a), R336.1901]

The following conditions apply to: EUCLEANUP

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
3.1	Acetone	EUCLEANUP	4.0 tpy	12-month rolling time	SC 3.3	R336.1224,
				period as determined		R336.1225
				at the end of each		
				calendar month.		

Recordkeeping/Reporting/Notification

- 3.2 The permittee shall complete all required calculations 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. [R336.1224, R336.1225]
- 3.3 The permittee shall keep the following information on a monthly basis for EUCLEANUP:
 - a) The amount (in gallons or pounds) of acetone used.
 - b) Where applicable, gallons or pounds of acetone reclaimed.
 - c) Acetone emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in a format acceptable to 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]

The following conditions apply to: FGFIBERGLASS

Process/Operational Limits

4.1 The permittee shall capture all waste cleanup solvent(s), catalyst(s), resin(s), and gelcoat(s) used in FGFIBERGLASS shall be captured and stored in closed containers. The permittee shall dispose of all waste [cleanup solvent(s), catalyst(s), resin(s), and gelcost(s)] in and acceptable manner in compliance with all applicable state rules and federal regulations. [R336.1224, R336.1702(a)]

Recordkeeping/Reporting/Notification

4.2 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (i.e lamination resin, gelcoat, catalyst, etc.), including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and made available to the Department upon request. [R336.1224, R336.1225, R336.1702(a)]

Stack/Vent Restructions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirements
4.3	SV-FIBERGLASS	38.0	40.0	R336.12250, R336.19010, 40CFR 52.21 © and (d)

The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.

Unified Emission Factors for Open Molding of Composites July 23, 2001 Emission Rate in Pounds of Styrene Emitted per Ton of Resin or Gelcoat Processed

sin /gelcoat, % ⁽¹⁾	<33 ⁽²⁾	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	1
al	0.126 x %styrene x 2000	83	89	94	100	106	112	117	123	129	134	140	146	152	157	163	169	174	180	((0.286 x %styr
opressed Resin			<u> </u>	Manual	emissio [,]	n factor	[listed :	above]	<u>к (1 —</u> (0	.50 x sp	ecific V	/SR red	uction f	actor for	r each r	esin/sur	ıppressan	it formu	lation))	
tomized	0.169 x %styrene x 2000	111	126	140	154	168	183	197	211	225	240	254	268	283	297	311	325	340	354	((0.714 x %sty
ed with VSR (3)			Mech2	unical At	omized r	emissio [,]	n factor	[listed	above]	x (1 – (0	.45 x sr	ecific V	/SR red	uction fa	actor for	r each re	esin/supp	pressan'	t formul	ation))
ted Controlled	0.130 x %styrene x 2000	86	97	108	119	130	141	152	163	174	185	196	207	218	229	240	251	262	273	0.77 x ((0.714 x
led Spray with		Mechan	ical Ato	mized C	ontroller	d Spray	emissic	on facto	r [listed	above]	x (1 – (,0.45 x s	pecific \	/SR red	uction f	actor fo	or each re	esin/sur	pressar	int formulation))
ı-Atomized	0.107 x %styrene x 2000	71	74	77	80	83	86	89	93	96	99	102	105	108	111	115	118	121	124	((0.157 x %styr
mized with VSR	i	M	iechanic	cal Non-/	Atomizer	d emiss	ion fact	or [liste	d above	.] x (1 –	(0.45 x	specific	: VSR re	duction	factor	ior each	resin/su	ippress:	ant form	nulation))
olication	0.184 x %styrene x 2000	122	127	133	138	144	149	155	160	166	171	177	182	188	193	199	204	210	215	((0.2746 x %s
on with VSR (3)	0.120 x %styrene x 2000	79	83	86	90	93	97	100	104	108	111	115	118	122	125	129	133	136	140	0.65 x ((0.2746
lication	0.445 x %styrene x 2000	294	315	336	356	377	398	418	439	460	481	501	522	543	564	584	605	626	646	((1.03646 x %
pray Application	0.325 x %styrene x 2000	215	230	245	260	275	290	305	321	336	351	366	381	396	411	427	442	457	472	0.73 x ((1.0364
ed Application (8)	SEE Note 9 below	196	205	214	223	232	241	250	259	268	278	287	296	305	314	323	332	341	350	((0.4506 x %
ter Roll-Out	·					Jan VCE		- <u>-</u> -	olon foo	tor Iliot	ad abay	-1 ·· /C	90 for I	Janual	Ors 0.8	5 for Mc	echanical)	<u> </u>		-
iter Kon-Cut	•				IX.	1011-12V	proces	S emis.	Ton rac.	voi [iist	u abov	rejx (υ.	7 101 no.	Mailuai 🔨	VOI > 0.0	O IOI IVIC	-ciiailica.,	***		

Emission Rate in Pounds of Methyl Methacrylate Emitted per Ton of Gelcoat Processed

MMA content in gelcoat, % (6)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	1/
Gel coat application (7)	15	30	45	60	75	90	105	120	135	150	165	180	195	210	225	24

Notes

- Including styrene monomer content as supplied, plus any extra styrene monomer added by the molder, but before addition of other additives such as powders,
- Formulas for materials with styrene content <33% are based on the emission rate at 33% (constant emission factor expressed as percent of available styrene), and for styrene content >50% on the emission rate based on the extrapolated factor equations; these are not based on test data but are believed to be conservative estimates. The value for "% styrene" in the formulas should be input as a fraction. For example, use the input value 0.30 for a resin with 30% styrene content by wt.
- The VSR reduction factor is determined by testing each resin/suppressant formulation according to the procedures detailed in the CFA Vapor Suppressant Effectiveness Test.
- SEE the CFA Controlled Spray Handbook for a detailed description of the controlled spray procedures.
- The effect of vapor suppressants on emissions from filament winding operations is based on the Dow Filament Winding Emissions Study.
- Including MMA monomer content as supplied, plus any extra MMA monomer added by the molder, but before addition of other additives such as powders, fillers,
- Based on gelcoat data from NMMA Emission Study.
- SEE the July 17, 2001 EECS report Emission Factors for Non-Atomized Application of Gel Coats used in the Open Molding of Composites for a detailed description of the Non-Atomized gelcoat testing.
- Use the equation ((0.4506 x %styrene) 0.0505) x 2000 for gelcoats with styrene contents between 19% and 32% by wt.; use the equation 0.185 x %styrene x 2000 for gelcoats with less than 19% styrene content by wt.