

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

September 22, 2006



PERMIT TO INSTALL

No. 276-06

ISSUED TO

Midwest Rubber Company

LOCATED AT

3525 Rangeline Road
Deckerville, Michigan 48427

IN THE COUNTY OF

Sanilac



STATE REGISTRATION NUMBER

A6444

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: September 5, 2006 | |
| DATE PERMIT TO INSTALL APPROVED: September 22, 2006 | 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 |
| COM | Continuous Opacity Monitoring | °F | Degrees Fahrenheit |
| EPA | Environmental Protection Agency | gr | Grains |
| EU | Emission Unit | Hg | Mercury |
| FG | Flexible Group | hr | Hour |
| GACS | Gallon of Applied Coating Solids | H ₂ S | Hydrogen Sulfide |
| GC | General Condition | hp | Horsepower |
| HAP | Hazardous Air Pollutant | lb | Pound |
| HVLP | High Volume Low Pressure * | m | Meter |
| ID | Identification | mg | Milligram |
| LAER | Lowest Achievable Emission Rate | mm | Millimeter |
| MACT | Maximum Achievable Control Technology | MM | Million |
| MAERS | Michigan Air Emissions Reporting System | MW | Megawatts |
| MAP | Malfunction Abatement Plan | ng | Nanogram |
| MDEQ | Michigan Department of Environmental Quality | NO _x | Oxides of Nitrogen |
| MSDS | Material Safety Data Sheet | PM | Particulate Matter |
| NESHAP | National Emission Standard for Hazardous Air Pollutants | PM-10 | Particulate Matter less than 10 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. **[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 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 R336.1219. The notification shall include all of the information required by R336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R336.1219(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. **[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 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 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 |
|---------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| EU-CL-05 | A natural gas heated carousel type plastisol casting line consisting of a chain conveyor that carries castings through filling stations; a curing oven; a cooling area; and a stripping station. | SV-CL-05-05-1 SV-CL-05-05-2 SV-CL-05-05-3 |
| 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. | | |

Flexible Group Identification

| Flexible Group ID | Emission Units Included in Flexible Group | Stack Identification |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| FGFACILITY | All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment. | NA |

The following conditions apply to: EU-CL-05

Emission Limits

| | Pollutant | Equipment | Limit | Time Period | Testing/ Monitoring Method | Applicable Requirements |
|-----|------------------|------------------|--------------|------------------------------------------------------------------------------|-------------------------------------------|------------------------------------|
| 1.1 | VOCs | EU-CL-05 | 1.8 tpy | 12-month rolling time period as determined at the end of each calendar month | SC 1.7 | R336.1702(a) |

Process / Operational Limits

- 1.2 The permittee shall capture all waste plastisol materials and shall store them in closed containers. The permittee shall dispose of all waste plastisol materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **[R336.1224, R336.1702(a)]**
- 1.3 The permittee shall handle all VOC containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **[R336.1225, R336.1702(a), R336.1901]**

Testing

- 1.4 The permittee shall determine the VOC content, water content and density of any material or solvent containing liquid, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **[R336.1702, R336.1901]**

Recordkeeping /Reporting /Notification

- 1.5 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor 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, R336.1901]**
- 1.6 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each plastisol material and solvent containing liquid, 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 make them available to the Department upon request. **[R336.1224, R336.1225, R336.1702, R336.1901]**
- 1.7 The permittee shall keep the following information on a monthly basis for EU-CL-05:
 - a) Gallons of each plastisol material and solvent containing liquid used.
 - b) VOC content of each plastisol material and solvent containing liquid used.
 - c) VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.

- d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
- e) Hours of operation.

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, R336.1901]**

Stack / Vent Restrictions

| | Stack & Vent ID | Maximum Diameter (inches) | Minimum Height Above Ground Level (feet) | Applicable Requirement |
|-------------------------------------------------------------------------------------------|----------------------------|----------------------------------|-------------------------------------------------|---------------------------------------------|
| 1.8a | SV-CL-05-05-1 | 18.0 | 24.3 | R336.1225, R336.1901, 40 CFR 52.21(c) & (d) |
| 1.8b | SV-CL-05-05-2 | 12.0 | 27.0 | R336.1225, R336.1901, 40 CFR 52.21(c) & (d) |
| 1.8c | SV-CL-05-05-3 | 18.0 | 23.4 | R336.1225, R336.1901, 40 CFR 52.21(c) & (d) |
| The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air. | | | | |

The following conditions apply to: FGFACILITY

Emission Limits

| | Pollutant | Equipment | Limit | Time Period | Testing/ Monitoring Method | Applicable Requirements |
|------|---------------------|------------------|--------------------|-------------------------------------------------------------------------------|-------------------------------------------|------------------------------------|
| 2.1a | Each Individual HAP | FGFACILITY | Less than 9.0 tpy | 12-month rolling time period as determined at the end of each calendar month. | SC 2.6 | R336.1205(3) |
| 2.1b | Aggregate HAPs | FGFACILITY | Less than 22.5 tpy | 12-month rolling time period as determined at the end of each calendar month. | SC 2.6 | R336.1205(3) |
| 2.1c | VOCs | FGFACILITY | Less than 90.0 tpy | 12-month rolling time period as determined at the end of each calendar month. | SC 2.7 | R336.1205(3) |

Process / Operational Limits

2.2 The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **[R336.1205(3)]**

Testing

2.3 The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **[R336.1205(3)]**

2.4 The permittee shall determine the VOC content, water content, and density of any material, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **[R336.1205(3)]**

Recordkeeping / Reporting / Notification

2.5 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **[R336.1205(3)]**

2.6 The permittee shall keep the following information on a monthly basis for FGFACILITY:

- a) Gallons or pounds of each HAP containing material used.
- b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
- c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
- d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- e) Individual and aggregate HAP emission calculations determining the annual emission rate of each 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. **[R336.1205(3)]**

2.7 The permittee shall keep the following information on a monthly basis for FGFACILITY:

- a) Gallons or pounds of each VOC containing material used.
- b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
- c) VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
- d) VOC emission calculations determining the monthly emission rate in tons per calendar month.
- e) 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.

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. **[R336.1205(3)]**