## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

July 6, 2007

# PERMIT TO INSTALL

No. 84-07



# STATE REGISTRATION NUMBER B4359

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: <b>3/29/2007</b>			
DATE PERMIT TO INSTALL APPROVED: <b>7/6/2007</b>	SIGNATURE:		
DATE PERMIT VOIDED:	SIGNATURE:		
DATE PERMIT REVOKED:	SIGNATURE:		

# **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	Dry standard cubic meter		
CFR	Code of Federal Regulations	°F	Degrees Fahrenheit		
СОМ	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		
МАСТ	Maximum Achievable Control Technology	MW	Megawatts		
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram		
MAP	Malfunction Abatement Plan	NOx	Oxides of Nitrogen		
MDEQ	Michigan Department of Environmental Quality	PM	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 P	National Emission Standard for 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 <sub>2</sub>	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				

\* 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 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	
EU-CheGraft	Process to produce a graft polyol. Equipment consists of three feed tanks (TK1, TK2, and TK3), a reaction vessel (R3), a stripping vessel (R424), an overhead condenser (E2), and a vacuum pump, with three insulated dry ice traps for emission control. This emission unit covers point source emissions only, and does not cover emissions from leaking components.	SVChe524	
EU-CheGraftFug	Components of EU-CheGraft that may be the source of fugitive emissions of volatile organic compounds.	N/A	
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 Identification**

Flexible Group ID	Emission Units Included in Flexible Group	Stack Identification
FG-CheGraft	EU-CheGraft and EU-CheGraftFug	SVChe524

### The following conditions apply to: FG-CheGraft

#### Material Usage Limits

1.1 The permittee shall not process more than 150 batches of material in FG-CheGraft per year, based on a rolling 12-month time period as determined at the end of each calendar month. (R 336.1225, R 336.1702(a))

#### **Process/Operational Limits**

1.2 The permittee shall implement and maintain a leak detection and repair (LDAR) program equivalent to the requirements of Rule 629 (R 336.1629) for EU-CheGraftFug, with semi-annual (not quarterly) reporting and the LDAR report submitted within 60 days following the end of the reporting period (not 25 days). Upon approval by the AQD District Supervisor of an equivalent control program, the permittee shall implement and maintain the approved equivalent control program. (R 336.1702(a))

#### Equipment

- 1.3 The permittee shall not perform any step of FG-CheGraft listed below unless the vapors from the step vent through at least two insulated dry ice traps in series, and all of the dry ice traps being used are installed, maintained, and operated in a satisfactory manner. Satisfactory operation of a dry ice trap includes filling the trap's reservoir with dry ice before venting begins and refilling the reservoir if a reservoir check during a step listed below reveals that the reservoir is less than half full at any time. (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)
  - Evacuating Tank 2 for charging

• Stripping residual monomer from the reaction vessel (R3)

### Monitoring

1.4 The permittee shall monitor, in a satisfactory manner, the dry ice content of each dry ice trap in use before and during each step listed in SC 1.3. (**R 336.1910**)

#### Recordkeeping/Reporting/Notification

- 1.5 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of batches produced for FG-CheGraft, as required by SC 1.1. 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 336.1225, R 336.1702(a))
- 1.6 The permittee shall keep, in a satisfactory manner, records of the dry ice content of each dry ice trap in use during each batch produced in FG-CheGraft, as required by SC 1.4. For each batch, the record shall include the following information:
  - Time of beginning and end of each step listed in SC 1.3;
  - Time the reservoir of each dry ice trap in use was checked;
  - For each check, whether the reservoir was at least half full, and whether dry ice was added.

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 336.1910**)

1.7 The permittee shall, in a satisfactory manner, keep records and submit reports required by the LDAR program for EU-CheGraftFug, as required by SC 1.2. 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))

#### **Stack/Vent Restrictions**

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement		
1.8	SVChe524	45	65.5	R 336.1225, R 336.1901		
	The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.					