# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

July 15, 2009



# STATE REGISTRATION NUMBER N2503

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:  June 22, 2009			
July 15, 2009	SIGNATURE:		
DATE PERMIT VOIDED:	SIGNATURE:		
DATE PERMIT REVOKED:	SIGNATURE:		

# PERMIT TO INSTALL

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# **Common Abbreviations / Acronyms**

Common Appreviations			Pollutant/Measurement Abbreviations		
AQD Air Quality Division			British thermal unit		
BACT	Best Available Control Technology	°C	Degrees Celsius		
CAA	Clean Air Act	СО	Carbon monoxide		
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot		
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter		
СОМ	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 <sub>2</sub> 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 <sub>x</sub>	Oxides of nitrogen		
MSDS	Material Safety Data Sheet	PM	Particulate matter		
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	PM less than or equal to 10 microns aerodynamic diameter		
NSPS	New Source Performance Standards	PM2.5	PM less than or equal to 2.5 microns aerodynamic diameter		
NSR	New Source Review	pph	Pound per hour		
PS	Performance Specification	ppm	Parts per million		
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume		
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight		
PTI	Permit to Install	psia	Pounds per square inch, absolute		
RACT	Reasonably Available Control Technology	psig	Pounds per square inch, gauge		
ROP	Renewable Operating Permit	scf	Standard cubic feet		
SC	Special Condition	sec	Seconds		
SCR	Selective Catalytic Reduction	SO <sub>2</sub>	Sulfur dioxide		
SRN	State Registration Number	THC	Total hydrocarbons		
TAC	Toxic Air Contaminant	tpy	Tons per year		
TEQ	Toxicity Equivalence Quotient	μg	Microgram		
VE	Visible Emissions	VOC	Volatile organic compounds		
		yr	Year		

<sup>\*</sup> 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 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.

Paint Booth 1, baking system, dry filters; SV00056	March 15, 2007	
	March 15, 2007	FGPAINTBOOTHS
Paint Booth, 2 baking system, dry filters; SV00057	March 15, 2007	FGPAINTBOOTHS
Paint Booth 3, baking system, dry filters; SV00028	March 15, 2007	FGPAINTBOOTHS
Paint Booth 4, baking system, dry filters; SV00029	March 15, 2007	FGPAINTBOOTHS
Paint Booth 5, baking system, dry filters; SV00030	March 15, 2007	FGPAINTBOOTHS
Paint Booth 6, baking system, dry filters; SV00031	March 15, 2007	FGPAINTBOOTHS
Paint Booth 7, baking system, dry filters; SV00032	March 15, 2007	FGPAINTBOOTHS
Paint Booth 8, baking system, dry filters; SV00033	March 15, 2007	FGPAINTBOOTHS
Undercoat booth 9, dry filters; SV00034	March 15, 2007	FGPAINTBOOTHS
Paint Repair Booth 10, baking system, dry filters; SV00035	March 15, 2007	FGPAINTBOOTHS
Paint Repair Booth 11, baking system, dry filters; SV00036	March 15, 2007	FGPAINTBOOTHS
Paint Repair Booth 12, baking system, dry filters; SV00037	March 15, 2007	FGPAINTBOOTHS
Paint Repair Booth 13, baking system, dry filters; SV00038	March 15, 2007	FGPAINTBOOTHS
Cleaning of spray guns	March 15, 2007	FGFACILITY
Cleaning of spray guns	March 15, 2007	FGFACILITY
6 gallon solvent recycler vented to paint mix room exhaust	March 15, 2007	FGFACILITY
6 gallon solvent recycler, ventless	March 15, 2007	FGFACILITY
	Paint Booth 3, baking system, dry filters; SV00028  Paint Booth 4, baking system, dry filters; SV00029  Paint Booth 5, baking system, dry filters; SV00030  Paint Booth 6, baking system, dry filters; SV00031  Paint Booth 7, baking system, dry filters; SV00032  Paint Booth 8, baking system, dry filters; SV00033  Undercoat booth 9, dry filters; SV00034  Paint Repair Booth 10, baking system, dry filters; SV00035  Paint Repair Booth 11, baking system, dry filters; SV00036  Paint Repair Booth 12, baking system, dry filters; SV00037  Paint Repair Booth 13, baking system, dry filters; SV00038  Cleaning of spray guns  Cleaning of spray guns  6 gallon solvent recycler vented to paint mix room exhaust  6 gallon solvent recycler, ventless	Paint Booth 3, baking system, dry filters; SV00029  Paint Booth 4, baking system, dry filters; SV00029  Paint Booth 5, baking system, dry filters; SV00030  Paint Booth 6, baking system, dry filters; SV00031  Paint Booth 7, baking system, dry filters; SV00032  Paint Booth 8, baking system, dry filters; SV00032  Paint Booth 9, dry filters; SV00034  Undercoat booth 9, dry filters; SV00034  Paint Repair Booth 10, baking system, dry filters; SV00035  Paint Repair Booth 11, baking system, dry filters; SV00036  Paint Repair Booth 12, baking system, dry filters; SV00036  Paint Repair Booth 13, baking system, dry filters; SV00037  Paint Repair Booth 13, baking system, dry filters; SV00038  Cleaning of spray guns  Cleaning of spray guns  March 15, 2007  March 15, 2007

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
FGPAINTBOOTHS	All paint booths located a the Spartan Chassis Plant 8 facility, 1663 Reynolds Road, Charlotte, Michigan	
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

# The following conditions apply to: FGPAINTBOOTHS

**<u>DESCRIPTION</u>**: eight production paint booths, one undercoat booth, and four paint repair booths. All emissions from the use of coatings and cleaning solvents in the booths are included

POLLUTION CONTROL EQUIPMENT: dry filters with a nominal 99% control efficiency rate

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs	5.0 tpy	12-month rolling time period as determined at the end of each calendar month			R 336.1702(a)

# II. MATERIAL LIMITS

NA

# III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall capture all waste coating materials and shall store them in closed containers. The permittee shall dispose of all waste coating materials in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702(a))
- 2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (R 336.1224, R 336.1370)
- 3. The permittee shall handle all VOC and / or 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. (R 336.1205(3), R 336.1224, R 336.1225, R 336.1702(a), R 336.1901)

# IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate each emission unit in FGPAINTBOOTHS unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. (R 336.1224, R 336.1301, R 336.1331, 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))

1. The permittee shall determine the VOC content, water content and density of any coating 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. (R 336.1702, R 336.1901)

### 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 15th 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 maintain a current listing from the manufacturer of the chemical composition of each coating 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 and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702, R 336.1901)
- 3. The permittee shall keep the following information on a monthly basis for FGPAINTBOOTHS:
  - a) Gallons (with water) of each coating material and solvent containing liquid used.
  - b) VOC content (minus water and with water) of each coating material and solvent containing liquid as applied.
  - c) VOC mass emission calculations determining the monthly emission rate in tons 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 and make them available to the Department upon request. (R 336.1205, R 336.1225, R 336.1299, R 336.1702, R 336.1901)

# VII. REPORTING

NA

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# 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 (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements	
1. SV00056	48	36 R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)		
2. SV00057	48	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	
3. SV00028	48	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	
4. SV00029	48	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	
5. SV00030	48	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	
6. SV00031	48	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	
7. SV00032	48	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	
8. SV00033	48	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	
9. SV00034	36	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	
10. SV00035	48	36 R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)		
11. SV00036	48	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	
12. SV00037	48	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	
13. SV00038	48	36	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)	

# IX. OTHER REQUIREMENTS

N/A

<u>Footnotes:</u> <sup>1</sup>This 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:**

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1 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.2	R 336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy *	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)
3. VOCs	Less than 90.0 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**

N/A

# **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. 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. (R 336.1205(3))

### IV. DESIGN/EQUIPMENT PARAMETERS

N/A

# V. TESTING/SAMPLING

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

- 1. 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. (R 336.1205(3))
- 2. 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. (R 336.1205(3))

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# 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 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205(3))

- 2. 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 and make them available to the Department upon request. (R 336.1205(3))

- 3. The permittee shall keep the following information on the basis indicated for FGFACILITY:
  - a) Gallons or pounds of each VOC containing material used. Daily basis
  - b) Where applicable, gallons or pounds of each VOC containing material reclaimed. Daily basis
  - VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used. Daily basis
  - 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 and make them available to the Department upon request. (R 336.1205(3))

### VII. REPORTING

N/A

#### VIII. STACK/VENT RESTRICTIONS

N/A

# IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart MMMM for Surface Coating of Miscellaneous Metal parts & Products, by the initial compliance date. (40 CFR Part 63, Subpart A and Subpart MMMM)

#### Footnotes:

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