

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

March 15, 2013

**PERMIT TO INSTALL
20-13**

ISSUED TO
Arrow Chemical Products

LOCATED AT
2067 Saint Anne Street
Detroit, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
P0356

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:

January 25, 2013

DATE PERMIT TO INSTALL APPROVED:

March 15, 2013

SIGNATURE:

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
Special Conditions	5
Emission Unit Summary Table.....	5
Flexible Group Summary Table	6
Special Conditions for FGCLEANPRODUCTS.....	7

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
CO ₂ e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H ₂ S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
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	ng	Nanogram
MAP	Malfuction Abatement Plan	NO _x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
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. **(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 48909-7760, 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 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 R 336.1219 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 R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(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.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EU2550TANK	2550 gallon completely enclosed plastic tank used exclusively for #160 Jem Dish Detergent	FGCLEANPRODUCTS
EU300TANK1	300 gallon tank	FGCLEANPRODUCTS
EU300TANK2	300 gallon tank	FGCLEANPRODUCTS
EU300TANK3	300 gallon tank	FGCLEANPRODUCTS
EU300TANK4	300 gallon tank	FGCLEANPRODUCTS
EU300TANK5	300 gallon tank with full cover	FGCLEANPRODUCTS
EU300TANK6	300 gallon tank with full cover	FGCLEANPRODUCTS
EU300TANK7	300 gallon open tank	FGCLEANPRODUCTS
EU300TANK8	300 gallon open tank	FGCLEANPRODUCTS
EU300TANK9	300 gallon open tank	FGCLEANPRODUCTS
EU1000TANK1	1000 gallon open tank	FGCLEANPRODUCTS
EU1000TANK2	1000 gallon open tank	FGCLEANPRODUCTS
EU800TANK	800 gallon open tank	FGCLEANPRODUCTS
EU440TANK	440 gallon open tank	FGCLEANPRODUCTS
EU410TANK	410 gallon open tank	FGCLEANPRODUCTS
EU1000TANK252L	1000 gallon tank for #252L Lemon Disinfectant. Has an 18 inch opening.	FGCLEANPRODUCTS
EU1250TANK	1250 gallon open tank used to blend and store #248 Citrus Degreaser	FGCLEANPRODUCTS
EU250TANK	250 gallon covered tank used to blend and store #197 Banana Mop Treatment	FGCLEANPRODUCTS
EU1600TANK	1600 gallon tank with 24 inch square opening used to blend and store #442 Acid Free Bathroom Cleaner	FGCLEANPRODUCTS
EU1200TANK	1200 gallon tank with a 10 inch by 8 inch opening used to store #234 Degreaser without dye	FGCLEANPRODUCTS
EU4500TANK1	4500 gallon tank with 12 inch square opening used to blend and store #234 Degreaser	FGCLEANPRODUCTS
EU4500TANK2	4500 gallon storage tank with 4 inch pipe opening used to hold glycol ether EB (butyl cellosolve)	FGCLEANPRODUCTS

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
FGCLEANPRODUCTS	Equipment used for producing cleaning products by mixing raw materials with water.	EU2550TANK EU300TANK1 EU300TANK2 EU300TANK3 EU300TANK4 EU300TANK5 EU300TANK6 EU300TANK7 EU300TANK8 EU300TANK9 EU1000TANK1 EU1000TANK2 EU800TANK EU440TANK EU410TANK EU1000TANK252L EU1250TANK EU250TANK EU1600TANK EU1200TANK EU4500TANK1 EU4500TANK2

The following conditions apply to: FGCLEANPRODUCTS

DESCRIPTION: Equipment used for producing cleaning products by mixing raw materials with water.

Emission Units: EU2550TANK, EU300TANK1, EU300TANK2, EU300TANK3, EU300TANK4, EU300TANK5, EU300TANK6, EU300TANK7, EU300TANK8, EU300TANK9, EU1000TANK1, EU1000TANK2, EU800TANK, EU440TANK, EU410TANK, EU1000TANK252L, EU1250TANK, EU250TANK, EU1600TANK, EU1200TANK, EU4500TANK1, EU4500TANK2

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	Less than 9 tons per year	12-month rolling time period as determined at the end of each calendar month.	FGCLEANPRODUCTS	VI.2	R336.1702(a)
2. Hydrochloric acid (HCl)	3 tons per year	12-month rolling time period as determined at the end of each calendar month.	FGCLEANPRODUCTS	VI.2	R336.1225

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Raw materials excluding hydrochloric acid and water	2.5MM gallons per year	12-month rolling time period as determined at the end of each calendar month.	FGCLEANPRODUCTS	VI.2	R336.1702(a)
2. Hydrochloric acid	250,000 gallons per year	12-month rolling time period as determined at the end of each calendar month.	FGCLEANPRODUCTS	VI.2	R336.1225

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record, in a satisfactory manner, the volume of all of the following used on a monthly basis:
 - a. Raw materials excluding hydrochloric acid
 - b. Hydrochloric acid

(R 336.1702(a))

2. The permittee shall keep, in a satisfactory manner, the following monthly and 12-month rolling time period records for FGCLEANPRODUCTS:
 - a. Volume of raw materials used, excluding hydrochloric acid
 - b. Volume of hydrochloric acid used
 - c. VOC emission calculations using 0.007 lb of VOC per gallon of raw material
 - d. Hydrochloric acid emission calculations using 0.02 lb hydrochloric acid per gallon of hydrochloric acid

The permittee shall keep all records on file at a location approved by the AQD District Supervisor and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA