

SUPPLEMENT TO PERMIT NO. 430-83A

George Balfer Drum & Barrel Company
Grand Rapids, Michigan

January 29, 1997

GENERAL CONDITIONS

1. Rule 201(1) - The process or process equipment covered by this permit shall not be reconstructed, relocated, altered, 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.
2. Rule 201(4) - If the installation, reconstruction, relocation, or alteration 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 person to whom this permit was issued, 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, reconstruction, relocation, or alteration of the equipment allowed by this Permit to Install.
3. Rule 201(6)(a) - If this Permit to Install is issued for a process or process equipment located at a stationary source which is subject to a Renewable Operating Permit pursuant to Rule 210, trial operation is allowed if the equipment performs in accordance with the terms and conditions of this Permit to Install and until the appropriate terms and conditions of this Permit to Install have been incorporated into the Renewable Operating Permit as a modification pursuant to Rule 216 or upon renewal pursuant to Rule 217. Upon incorporation of the appropriate terms and conditions into the Renewable Operating Permit, this Permit to Install shall become void.
4. Rules 201(6)(b)(i) or 216(1)(a)(v)(A) - Except as provided in General Condition No. 3, operation of the process or process equipment is allowed if, not more than 30 days after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this Permit to Install was issued, or the authorized agent pursuant to Rule 204, notifies the District Supervisor, Air Quality Division, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, alteration, or modification is considered to occur not later than commencement of trial operation of the process or process equipment.
5. Rule 201(6)(b)(ii) - Except as provided in General Condition No. 3, not more than 18 months after completion of the installation, construction, reconstruction, relocation, alteration, or modification authorized by this Permit to Install, the person to whom this permit was issued, or the authorized agent pursuant to Rule 204, shall notify the District Supervisor, Air Quality Division, in writing, of the status of compliance of the process or process equipment with the terms and conditions of the Permit to Install. The notification shall include all of the following:
 - A. The results of all testing, monitoring, and recordkeeping performed to determine the actual emissions from the process or process equipment and to demonstrate compliance with the terms and conditions of the Permit to Install.
 - B. A schedule of compliance for the process or process equipment as described in Rule 119(a).

- C. A statement, signed by the person owning or operating the process or process equipment, that, based on information and belief formed after reasonable inquiry, the statements and information in the notification are true, accurate, and complete.
6. Rule 201(7) and Section 5510 of Act 451, P.A. 1994 - 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 Departments' rules or the Clean Air Act.
 7. Rule 219 - A new owner or operator of the process or process equipment covered by this Permit to Install shall immediately make a written request to the Department for a change of ownership or operational control. The request shall include all of the information required in Rule 219(1)(a), (b) and (c). If the request for a change in ownership or operational control is approved, the terms and conditions of this Permit to Install shall apply to the person or legal entity which hereafter owns or operates the process or process equipment for which this Permit to Install is issued. The written request shall be sent to the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909.
 8. Rule 901 - 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.
 9. Rule 912 - The owner or operator of a source, process, or process equipment shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant in excess of standards for more than one hour, or of any air contaminant in excess of standards for more than two hours, as required in this rule, to the District Supervisor, Air Quality Division. 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 District Supervisor within 10 days, with the information required in this rule.
 10. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future regulations which may be promulgated under Part 55 of Act 451, P.A. 1994.
 11. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
 12. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.

SPECIAL CONDITIONS

13. The total volatile organic compound (VOC) emission rate from the exterior barrel coating line shall not exceed 24.5 pounds per hour nor 22.7 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month.
14. The total volatile organic compound (VOC) emission rate from the interior barrel coating line shall not exceed 22.4 pounds per hour nor 10.5 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month.
15. The total volatile organic compound (VOC) emission rate from the cleanup and purge operations shall not exceed 35.2 pounds per hour nor 9.5 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month.
16. The volatile organic compound (VOC) emission rate from the exterior barrel coating line shall not exceed 3.5 pounds per gallon of coating (minus water) as applied.
17. The volatile organic compound (VOC) emission rate from the interior barrel coating line shall not exceed 4.3 pounds per gallon of coating (minus water) as applied based upon a calendar day averaging period.
18. There shall be no visible emissions from any portion of the exterior barrel coating line.
19. There shall be no visible emissions from any portion of the interior barrel coating line.
20. There shall be no visible emissions from any portion of the cleanup and/or purge operations.
21. Rules 1001, 1003 and 1004 - Verification of volatile organic compound (VOC) emission rates from any portion of or the entire exterior barrel coating line; any portion of or the entire interior barrel coating line; and/or any portion of or the entire cleanup and/or purge operations by testing, at owner's expense, in accordance with Department requirements, may be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the District Supervisor, Air Quality Division, and results shall be submitted within 120 days of the written requirement for such verification.
22. The applicant shall keep a separate monthly record, acceptable to the District Supervisor, of the following information for each of the two coating lines:
 - A. Hours of operation of the coating line.

- B. For each coating used:
 - 1. The amount in gallons used (with water).
 - 2. The VOC content in pounds per gallon (minus water and with water) as applied.
- C. VOC emissions calculations determining the total mass emissions from the coating line in tons per month and a 12-month rolling time period mass emission at the end of each calendar month in tons per year.
- D. For the interior barrel coating line only, average VOC emission calculations determining the pounds per gallon of coating (minus water) as applied for each calendar day.

All such records shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.

23. The applicant shall keep a monthly record, acceptable to the District Supervisor, of the following information for the cleanup and purge operations:

- A. Hours of operation of the cleanup and purge operations.
- B. For each solvent used:
 - 1. Its VOC content in pounds per gallon.
 - 2. The amount in gallons used.
 - 3. The amount in gallons reclaimed.
- C. VOC emissions calculations determining the total mass emissions from the cleanup and purge operation in tons per month and a 12-month rolling time period mass emission at the end of each calendar month in tons per year.

All such records shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.

24. The applicant shall use high volume low pressure (HVLP) spray equipment in all spray coating booths or an equivalent technology with comparable transfer efficiency. All coating applicators shall be properly installed, maintained and operated according to manufacturers specifications.
25. The applicant shall not operate either of the two spray coating booths unless all exhaust filters are in place and operating properly.

26. The disposal of spent filters, and/or waste coating, reducers, and/or cleanup and/or purge solvents shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.
27. The exhaust gases from the two spray coating booths shall be discharged unobstructed vertically upwards to the ambient air from two stacks (one per booth), each with a maximum diameter of 24 inches at an exit point not less than 49 feet above ground level.
28. The exhaust gases from the two coating ovens shall be discharged unobstructed vertically upwards to the ambient air from two stacks (one per oven), each with a maximum diameter of 18 inches at an exit point not less than 45 feet above ground level.
29. Total emissions of any single hazardous air pollutant (HAP) from the exterior barrel coating line, the interior barrel coating line, and the cleanup and purge operations shall be less than 10 tons per year and the total aggregate emissions of all HAP's from the exterior barrel coating line, the interior barrel coating line, and the clean up and purge operations shall be less than 25 tons per year; both based on a 12-month rolling time period as determined at the end of each calendar month.
30. The applicant shall keep a monthly record, acceptable to the District Supervisor, of the following information for the exterior barrel coating line, the interior barrel coating line, and the cleanup and purge operations:
 - A. The amount, in gallons, of all coatings, reducers, cleanup and/or purge solvents used.
 - B. The individual type and amount of each HAP contained within each coating, reducers, cleanup and/or purge solvent used.
 - C. Calculations determining the total mass emissions of each individual HAP and all aggregate HAPs on a pounds per month basis and on a 12-month rolling time period basis at the end of each calendar month in tons per year.

All such records shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.