

SUPPLEMENT TO PERMIT NO. 748-90A

Downs Manufacturing  
Lawton, Michigan

January 28, 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. 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 Rule 219 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 in Rule 219(1)(a), (b) and (c). The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality.
  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 styrene emission rate from the hand lay-up or spray up of resin used for the manufacture of replica auto bodies hereinafter "process", shall not exceed 2.2 pounds per hour nor 3.2 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. This emission rate is based on the use of 14,000 pounds per month of resin with a maximum content of 37 per cent styrene by weight and an emission factor of 0.04 pounds of styrene emitted per pound of resin used.
14. The styrene emission rate from the gel spray booth used in the process shall not exceed 1.3 pounds per hour nor 1.9 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. This emission rate is based on the use of 2,000 pounds per month of gel with a maximum content of 43 per cent styrene by weight and an emission factor of 0.15 pounds of styrene emitted per pound of gel used.
15. The emission rate from the use of acetone as clean-up in the process shall not exceed 5.1 pounds per hour nor 7.3 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.
16. There shall be no visible emissions from the process.
17. Rules 1001, 1003 and 1004 - Verification of volatile organic compound (VOC) and styrene emission rates from the process 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.
18. The applicant shall not exceed the following raw material usage rates:

<u>TYPE</u>	<u>HOURLY</u>	<u>MONTHLY</u>	<u>YEARLY *</u>
Resin	55 pounds	14,000 pounds	168,000 pounds
Gel	9 pounds	2,000 pounds	24,000 pounds
Acetone	5.1 pounds	1,200 pounds	14,400 pounds

\* Based on a 12-month rolling time period

19. Applicant shall keep a written record of the following for each calendar month for the process:
  - a. The amount of resin used, its VOC and styrene contents in pounds per gallon of resin used. Monthly records of the coatings and solvents, including cleanup solvents used in the resin application and the VOC content of all materials and solvents used.
  - b. The amount of gel coat used, its VOC and styrene contents in pounds per gallon of gel coat used. Monthly records of the coatings and solvents, including cleanup solvents used in the gel coat application and the VOC content of all materials and solvents used.
  - c. The VOC content of the catalyst and cleanup solvents used, their VOC contents in pounds per gallon used.
  - d. Hours of operation compiled on a daily basis.
  - e. Emission calculations determining styrene and VOC emission rates in terms of an average pounds per hour, tons per month, and tons per year on a 12-month rolling average time period basis.

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

20. Applicant shall not operate the gel spray booth unless all exhaust filters are in place and operating properly.
21. The exhaust gases from the gel spray booth shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 43 inches at an exit point not less than 50 feet above ground level.
22. The disposal of spend filters and/or waste resins, gel coats, reducers, catalysts and/or cleanup solvents shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.

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