

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

July 16, 2007

**PERMIT TO INSTALL
814-91B**



ISSUED TO
Industrial Container Services – MI, LLC

LOCATED AT
4336 Hansen Avenue, SW
Grand Rapids, Michigan

IN THE COUNTY OF
Kent

STATE REGISTRATION NUMBER
B1715

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 11, 2007	
DATE PERMIT TO INSTALL APPROVED: July 16, 2007	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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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	CO	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
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
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	NO _x	Oxides of Nitrogen
MAP	Malfunction Abatement Plan	PM	Particulate Matter
MDEQ	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns diameter
MIOSHA	Michigan Occupational Safety & Health Administration	pph	Pound per hour
MSDS	Material Safety Data Sheet	ppm	Parts per million
NESHAP	National Emission Standard for Hazardous Air Pollutants	ppmv	Parts per million by volume
NSPS	New Source Performance Standards	ppmw	Parts per million by weight
NSR	New Source Review	psia	Pounds per square inch absolute
PS	Performance Specification	psig	Pounds per square inch gauge
PSD	Prevention of Significant Deterioration	scf	Standard cubic feet
PTE	Permanent Total Enclosure	sec	Seconds
PTI	Permit to Install	SO ₂	Sulfur Dioxide
RACT	Reasonable Available Control Technology	THC	Total Hydrocarbons
ROP	Renewable Operating Permit	tpy	Tons per year
SC	Special Condition Number	µg	Microgram
SCR	Selective Catalytic Reduction	VOC	Volatile Organic Compounds
SRN	State Registration Number	yr	Year
TAC	Toxic Air Contaminant		
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 R336.1210, 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 R336.1219 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 R336.1219. The written request 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 R336.1301, 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 R336.1303. **(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 R336.1370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R336.2001 and R336.2003, under any of the conditions listed in R336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification
EUDRUMFURNACE	One drum reconditioning furnace controlled by a thermal oxidizer.	SVDRUMFURNACE
Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 to R336.1290.		

The following conditions apply to: EUDRUMFURNACE

Emission Limits

- 1.1 The particulate emission rate from EUDRUMFURNACE shall not exceed 0.30 pounds per 1,000 pounds of exhaust gases, corrected to 50% excess air. **(R 336.1331)**

Visible Emission Limits

- 1.2 Visible emissions from EUDRUMFURNACE shall not exceed a six-minute average of 20 percent opacity, except as specified in Rule 301(1)(a). **(R 336.1301)**

Process/Operational Limits

- 1.3 The permittee shall process only containers which are empty as defined in 40 CFR 261.7(b). **(R 336.1910)**
- 1.4 The permittee shall not accept for reconditioning any containers that formerly contained acute hazardous wastes as listed in 40 CFR 261.33(e). **(R 336.1910)**
- 1.5 The permittee shall maintain its existing fencing to prevent unauthorized individuals from entering the area of the furnace. **(R 336.1901)**
- 1.6 Input feed to the furnace shall cease immediately, consistent with safe operating procedures, upon initiation of thermal oxidizer malfunction. Input feed to the furnace shall not restart until the thermal oxidizer is back on line and functioning properly. **(R 336.1911)**
- 1.7 The permittee shall not operate EUDRUMFURNACE unless a minimum temperature of 1600 °F and a minimum retention time of 1.0 seconds in the thermal oxidizer is maintained. **(R 336.1224, R 336.1901, R 336.1910)**

Equipment

- 1.8 The permittee shall not operate the drum furnace unless the thermal oxidizer is installed, maintained, and operated in a satisfactory manner. **(R 336.1224, R 336.1901, R 336.1910)**
- 1.9 The permittee shall not operate the drum furnace in EUDRUMFURNACE unless the secondary containment facilities are maintained and control procedures to prevent the loss of hazardous materials are followed. **(R 336.1901, R 336.1911)**

Monitoring

- 1.10 The permittee shall monitor and record, in a satisfactory manner, the temperature from the thermal oxidizer on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. **(R 336.1224, R 336.1901, R 336.1910)**

- 1.11 The permittee shall monitor and record the visible emissions from the furnace on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. An alarm shall be set to go off at an opacity as established by the District Supervisor. **(R 336.1301)**
- 1.12 The permittee shall conduct a monthly visual inspection of the thermal oxidizer to identify any signs of corrosion. If corrosion damage is identified, the permittee shall initiate corrective action to repair any damage within 30 days. The permittee shall keep, in a satisfactory manner, records of the monthly visual inspections which shall include, at a minimum, the dates and results of the inspections and the dates and reasons for repairs. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1910)**

Recordkeeping/Reporting/Notification

- 1.13 The permittee shall keep the following information for each shipment of drums/containers received and processed in EUDRUMFURNACE:
 - a) Origin (i.e. company name) of each drum processed through the furnace.
 - b) The number of drums from each originating company.
 - c) Documentation for each shipment of drum/containers received for processing that they did not contain acute hazardous waste as listed in 40 CFR 261.33(e).

The records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1224, R 336.1901)**

- 1.14 The permittee shall keep, in a satisfactory manner, records of all visible emission readings for EUDRUMFURNACE. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, and status of visible emissions. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1301)**
- 1.15 The permittee shall keep, in a satisfactory manner, operating temperature records for the thermal oxidizer as required by SC 1.10. If the measured operating temperature of the thermal oxidizer falls below 1600 °F during operation of EUDRUMFURNACE, compliance may be demonstrated based upon a three-hour average temperature, by calculating the average operating temperature for each three hour period which includes one or more temperature readings below 1600 °F. All records and calculations shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1224, R 336.1901, R 336.1910)**

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
1.16	SVDRUMFURNACE	42	40	R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				