

SUPPLEMENT TO PERMIT NO. 515-95A

Rieter Automotive North America, Inc.
Dryden, Michigan

July 2, 1997

GENERAL CONDITIONS

1. Rule 201(1) - The person to whom this permit was issued shall not reconstruct, alter, modify, or relocate this equipment unless plans, specifications, and an application for a Permit to Install are submitted to and approved by the Department, unless otherwise exempt from the permit requirements.
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 Natural Resources, 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 has been issued 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) and 216(1)(a)(v)(A) - 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, shall notify 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 Natural Resources, P.O. Box 30260, Lansing, Michigan 48909.
8. Except as allowed by Rules 278 through 290, the person to whom this permit was issued shall not substitute any fuels, coatings, nor raw materials for those described in the application and allowed by this permit, nor make changes to the process or process equipment described in the application, without prior notification to and approval by the Air Quality Division.
9. 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.
10. 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.
11. 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.
12. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

SPECIAL CONDITIONS

13. The volatile organic compound (VOC) emission rate when using coatings and adhesives in the six coatings and adhesive spray booths, identified as "A" and "C" through "H," hereinafter "spray booths," and DSMF-41 line flow gun, HF line flow gun & adhesive sprayer, LH line adhesive sprayer, and ZQ line adhesive sprayer, hereinafter "other jobs," shall not exceed 19.0 pounds per hour nor 31.5 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.
14. The VOC emission rate from the use of clean-up solvents in the spray booths, maintenance & cleaning of spray & conveyor equipment, and finished parts & cleaning materials, hereinafter "cleanup usage" shall not exceed 21.8 pounds per hour nor 3.0 tons per year based on a 12-month rolling time as determined at the end of each calendar month.
15. The VOC emission rate from the spray booths and other jobs when used for coating metal parts shall not exceed 3.0 pounds per gallon of coating (minus water) as applied, based upon a monthly averaging period. These records shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.
16. The acetone emission rate from the spray booths shall not exceed 9.2 pounds per hour nor 14.8 tons per year, based on 12-month rolling time period as determined at the end of each calendar month.
17. Visible emissions from the spray booths shall not exceed a 6-minute average of 20% opacity, except as specified in Rule 301(1)(a) .
18. Rules 1001, 1003 and 1004 - Verification of VOC emission rates from the spray booths and other jobs, by testing, at owner's expense, in accordance with Department requirements, may be required for operating approval. The testing shall be conducted within 60 days following the receipt of the written notification of the requirement. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, a complete test plan must be submitted to the Air Quality Division. The final plan must be approved by the Division prior to testing and a complete report of test results must be submitted to the Division within 60 days following the last date of testing.
19. Applicant shall keep a separate record of the following for each calendar month for the spray booths and other jobs:
 - A. For each coating, adhesive, and cleanup solvent:
 1. The identification of the paint, adhesive, or cleanup solvents.
 2. The VOC content in pounds per gallon of paint, adhesive, or cleanup solvent (minus water) as received, and as applied.

3. The total amount, in gallons (minus water), of coatings, adhesives, and cleanup solvents as received and as applied.
 4. The percentage by weight of acetone.
 5. The mixing ratio of coating/adhesive to solvent, reducer, and thinner.
- B. Separate emissions calculations determining monthly emission rates in tons per month and a 12-month rolling time period emission rate as determined in tons per year for the following:
1. Coatings and adhesives: VOCs
 2. Clean up usage: VOCs
 3. All: Acetone
- C. Total hours of operation.
- D. VOC emission calculations determining compliance with Special Condition No. 15.

These 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 maintain a current listing of the chemical composition of each material, including the weight percent of each compound.
21. Applicant shall not operate any spray booth unless the associated exhaust filters are in place and operating properly.
22. The exhaust gases from the spray booths shall be discharged unobstructed vertically upwards to the ambient air from stacks with maximum diameters and minimum heights above ground level as follows:

Booth	Maximum Diameter (Inches)	Minimum Height (Feet)
A	24	19.9
C	24	27.9
D	24	26.0
E	24	28.5
F	24	26.0
G	18	26.0
H	18	38.5

23. The disposal of waste materials and collected air contaminants shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.

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24. The applicant shall use high volume, low pressure (HVLP) spray guns or an equivalent technology with comparable coating transfer efficiency. All coating applicators shall be properly installed, maintained and operated according to manufacturer's specifications.
25. All purge solvents and coatings from all coating applicators used in the spray booths shall be captured and stored in closed containers and disposed in an acceptable manner in compliance with all applicable rules and regulations.
26. The VOC content of the solvent based adhesive used as applied shall be determined using federal Reference Test Method 24. Upon prior approval of the District Supervisor, Air Quality Division, the VOC content may alternatively be determined from manufacturer's formulation data.

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