

SUPPLEMENT to PERMIT No. 230-96

Eagle-Picher Industries—Wolverine Gasket Division  
Inkster, Michigan

January 16, 1998

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 48909-7760, 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(7)(a) 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(7)(b)—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 record keeping 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(8) 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. For the purposes of this permit to install, all requirements for notifications, or submittal of records to, or approvals by, the District Supervisor, Air Quality Division, should be submitted to the Director of Compliance and Enforcement, Wayne County Department of Environment, Air Quality Management Division unless you are otherwise notified in writing by the Air Quality Division. At no time shall notifications or submittals to or approvals by both agencies be required pursuant to this permit.
14. Emissions from the paper/coil coating line, hereinafter “coating line”, controlled by the thermal oxidizer shall not exceed the limits in Table 1, based on a 12-month rolling time period as determined at the end of each calendar month. These emission rates are based on a minimum volatile organic compound (VOC) capture efficiency of 90 percent and a minimum destruction efficiency of 95 percent in the thermal oxidizer.

Table 1: Allowable Coating Line Emission Rates

<b>Pollutant</b>	<b>Hourly Emission Rate (lbs/hr)</b>	<b>Annual Emission Rate (tons/yr)</b>
carbon monoxide	0.42	1.26
nitrogen oxides	1.68	5.04
volatile organic compounds (VOCs)	53.5	62.4
total hazardous air pollutants (HAPs)	none	18.1
methyl ethyl ketone (MEK)	44.8	7.30
toluene	33.8	6.30
all other individual HAPs	none	8.50

15. The applicant shall not operate the coating line unless all the applicable provisions of Michigan Public Act 451 of 1994, as amended, Administrative Rule 610(7) are met. Specifically, as regulated by Table 63, the VOC emission limit for the coating line shall be 2.9 pounds of VOCs emitted per gallon of coating, minus water, as applied.

16. Concerning the thermal oxidizer:
  - A) The applicant shall not operate the coating line unless the thermal oxidizer is installed and operating properly.
  - B) A minimum gas stream temperature of 1400 °F and a minimum retention time of 0.38 seconds shall be maintained in the thermal oxidizer when coating both sides of the gasket material.
  - C) A minimum gas stream temperature of 1200 °F and a minimum retention time of 0.38 seconds shall be maintained in the thermal oxidizer when coating one side of the gasket material.
17. Visible emissions from the coating line and the thermal oxidizer shall not exceed five percent (5%) opacity.
18. The applicant shall not use more than 140,000 gallons of coating per year.
19. The VOC content, water content, density, and solids fraction of any coating as applied and as received shall be determined using USEPA 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, which includes batch composition from the coating manufacturer and the amount of reducing agent or other compounds added to the coating.
20. The applicant shall monitor and record the temperature in the thermal oxidizer on a continuous basis in a manner and instrumentation acceptable to the Air Quality Division. All such records shall be maintained for the most recent two-year period and made available to the Air Quality Division in an acceptable format upon request.
21. The applicant shall not operate the coating line for more than 6,000 hours per year.
22. The exhaust gases from the thermal oxidizer shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum size of 36 inches by 20 inches at an exit point not less than 45 feet above ground level.
23. Rules 1001, 1003, and 1004—Verification of VOC emission rates by testing from the coating line, at the 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 testing 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.

24. Annual throughputs for process tanks shall not exceed the limits specified in Table 2, based upon a 12-month rolling time period as determined at the end of each calendar month.

Table 2: Allowable Annual Throughputs in Process Tanks

<b>Process Tank</b>	<b>Annual Throughput (gallons per year)</b>
Toluene	20,000
Methyl Ethyl Ketone (MEK)	30,000
Di-isobutyl Ketone	10,000
Lactol	35,000

25. The applicant shall keep a separate record for each calendar day of the following for each coating process:
- A) For each coating applied
    - i. The identification and the coating category for each coating used (as per Rule 610, Table 63 A(2), B(3).
    - ii. The amount, in gallons, of each coating used.
    - iii. The VOC content, in pounds per gallon of coating (minus water), as received and as applied.
    - iv. The total Hazardous Air Pollutant (HAP) content, in pounds per gallon of coating (minus water), as received and as applied.
    - v. The individual HAP content, in pounds per gallon of coating (minus water), as received and as applied.
  - B) The hours of operation.
  - C) The total amount, in gallons, of all coatings used.

All records shall be kept on file for the most recent two-year period and made available to the Air Quality Division in an acceptable format upon request.

26. Concerning record keeping:

- A) The applicant shall keep a separate record for each calendar month of the VOC, total HAP, and individual HAP emission calculations determining a 12-month rolling time period emission rate in tons per year for the coating operations.
- B) The applicant shall also record the monthly hours of operation and coating usage, determining a 12-month rolling time period.

All such records shall be kept on file for the most recent two-year period and made available to the Air Quality Division in an acceptable format upon request.