

SUPPLEMENT TO PERMIT NO. 370-96
Broad, Vogt and Conant
River Rouge, Michigan
July 21, 1999

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, PO 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 that is subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, trial operation is allowed by this permit 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. 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) - 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 R 336.1210, 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.
5. 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.
6. Rule 219 - 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 R 336.1219 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 R 336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality.

7. 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.
8. 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.
9. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future applicable requirements which may be promulgated under Part 55 of Act 451, P.A. 1994 or the Clean Air Act.
10. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
11. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.
12. Rule 301 - 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 R 336.1301, a person 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 R 336.1303.
 - a) A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% 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.
13. Rule 370 - 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 R 336.1370(2).

14. Rule 285 - Except as allowed by Rule 285 (a), (b), and (c), applicant 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.
15. The Department may require the applicant to conduct acceptable performance tests, at the applicant's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001.

SPECIAL CONDITIONS
July 21, 1999
(11 Special Conditions)

1. 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, Air Quality Management Division, Wayne County Department of Environment unless the applicant is 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.
2. The volatile organic compound (VOC) emission rate from the solvent clean up system and paint spray area shall not exceed 37.4 pounds per hour nor 18.7 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month.
3. The hazardous air pollutant (HAP) emissions, as defined pursuant to Section 112(b) of the Clean Air Act, shall be less than 9.95 tons per year for any individual HAP and 11.3 tons per year for any combination of HAPs at this stationary source. The annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month.
4. The acetone emission rate from the solvent clean up system and paint spray area shall not exceed 0.7 pounds per hour nor 1.2 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month.
5. The volatile organic compound (VOC) content of the coatings used in the paint spray area shall not exceed 3.5 pounds per gallon of coating (minus water) as applied.
6. The applicant shall not operate the paint spray application equipment unless the ceiling exhaust fan and paint application equipment are installed and operating properly.
7. The VOC content, water content, density, and solids fraction of any coating as applied and as received shall be determined using federal Reference Test Method 24. Upon prior approval of the District Supervisor, Air Quality Division, VOC content, water content, density and solids volume fraction may alternatively be determined from manufacturer's formulation data.
8. Applicant shall keep a separate record for each calendar month of the following for the solvent clean up system and paint spray area:

- A. For each coating:
 - 1. The identification and the coating category.
 - 2. The VOC content in pounds per gallon of coating, as received and the total amount of coating used in gallons.
 - 3. The weight percent of acetone, if applicable.
- B. For each clean up material:
 - 1. The VOC content in pounds per gallon and the total amount in gallons of purge and clean up solvent used in the process.
 - 2. The weight percent of acetone, if applicable.
- C. For each HAP:
 - 1. The identification of the HAP.
 - 2. The weight percent in pounds per gallon of each and all HAPs and the total amount used in gallons.
- D. Separate VOC, acetone, individual HAP and combined HAP emission calculations determining monthly emission rates in tons per month.
- E. Separate VOC, acetone, individual HAP and combined HAP emission calculations determining a 12-month rolling time period emission rate in tons per year.

All records shall be kept on file for a period of five years and made available to the Air Quality Division in an acceptable format upon request.

- 9. The exhaust gases from the paint spray area and solvent clean up equipment shall be discharged unobstructed vertically upwards to a ceiling exhaust fan with a maximum diameter of 42 inches at an exit point not less than 35 feet above ground level.
- 10. Verification of VOC, acetone and HAP emission rates from the paint spray and solvent clean up system by testing, at owner's expense, in accordance with Department requirements, may be required. The testing shall be conducted within 60 days following 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. This condition establishes performance testing requirements pursuant to Rules 1001, 1003, and 1004.

11. The applicant shall maintain a current listing of the chemical composition of each VOC, acetone and HAP containing material used in the paint spray area and solvent clean up system, including the weight percent of each compound. These records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.