

**MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION**

January 24, 2011

PERMIT TO INSTALL
81-96D

ISSUED TO
The George P. Johnson Company

LOCATED AT
3600 Giddings Road
Auburn Hills, Michigan

IN THE COUNTY OF
Oakland

STATE REGISTRATION NUMBER
N5771

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Natural Resources and Environment. 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: November 30, 2010	
DATE PERMIT TO INSTALL APPROVED: January 24, 2011	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

Section	Page
Alphabetical Listing of Common Abbreviations / Acronyms	2
General Conditions	3
Special Conditions	5
Emission Unit Summary Table.....	5
Flexible Group Summary Table	5
Special Conditions for FG-DISPLAYCOAT.....	6
Special Conditions for FGFACILITY	9

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	ng	Nanogram
MAP	Malfunction Abatement Plan	NO _x	Oxides of Nitrogen
MDNRE	Michigan Department of Natural Resources and Environment (Department)	PM	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM10	PM less than or equal to 10 microns diameter
MSDS	Material Safety Data Sheet	PM2.5	PM less than or equal 2.5 microns diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	pph	Pound per hour
NSPS	New Source Performance Standards	ppm	Parts per million
NSR	New Source Review	ppmv	Parts per million by volume
PS	Performance Specification	ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge
PTI	Permit to Install	scf	Standard cubic feet
RACT	Reasonably Available Control Technology	sec	Seconds
ROP	Renewable Operating Permit	SO ₂	Sulfur Dioxide
SC	Special Condition	THC	Total Hydrocarbons
SCR	Selective Catalytic Reduction	tpy	Tons per year
SRN	State Registration Number	µg	Microgram
TAC	Toxic Air Contaminant	VOC	Volatile Organic Compounds
TEQ	Toxicity Equivalence Quotient	yr	Year
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 Natural Resources and Environment, 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 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. **(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 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 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Natural Resources and Environment. **(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 R 336.1301, 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 R 336.1303. **(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 R 336.1370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU-PROCESS101	Topcoat spray booth No. 1. SV: SV-PROCESS101	1996 / 01/2011	FG-DISPLAYCOAT FGFACILITY
EU-PROCESS102	Topcoat spray booth No. 2. SV: SV-PROCESS102	1996 / 01/2011	FG-DISPLAYCOAT FGFACILITY
EU-PROCESS103	Topcoat spray booth No. 3. SV: SV-PROCESS103	1996 / 01/2011	FG-DISPLAYCOAT FGFACILITY
EU-PROCESS104	Prep/sanding/prime coat spray booth No. 1. SV: SV-PROCESS104	1996 / 01/2011	FG-DISPLAYCOAT FGFACILITY
EU-PROCESS105	Zolatone® application spray booth. SV: SV-PROCESS105	1996 / 01/2011	FG-DISPLAYCOAT FGFACILITY
EU-PROCESS111	Prep/sanding/prime coat spray booth No. 6. SV: SV-PROCESS111	1996 / 01/2011	FG-DISPLAYCOAT FGFACILITY
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-DISPLAYCOAT	Spray booths and associated finishing equipment.	EU-PROCESS101, EU-PROCESS102, EU-PROCESS103, EU-PROCESS104, EU-PROCESS105, and EU-PROCESS111
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

The following conditions apply to: FG-DISPLAYCOAT

DESCRIPTION: Spray booths and associated finishing equipment.

Emission Units: EU-PROCESS101, EU-PROCESS102, EU-PROCESS103, EU-PROCESS104, EU-PROCESS105, and EU-PROCESS111

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOCs and acetone (combined)	30.0 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-DISPLAYCOAT	SC VI.2 & SC VI.3	R336.1224, R336.1702(d)
2. VOCs and acetone (combined)	10.0 tpy	12-month rolling time period as determined at the end of each calendar month	Each Emission Unit in FG-DISPLAYCOAT	SC VI.2 & SC VI.3	R336.1224, R336.1702(d)
3. VOCs and acetone (combined)	2,000 pounds per month	Calendar month	Each Emission Unit in FG-DISPLAYCOAT.	SC VI.2 & SC VI.3	R336.1224, R336.1702(d)
4. Dimethylethanol amine (CAS No. 108-01-0)	10.0 pounds per day	Calendar day	FG-DISPLAYCOAT	SC VI.2 & SC VI.4	R336.1225, R336.1901
5. Xylene (CAS No. 1330-20-7)	62.6 pounds per day	Calendar day	FG-DISPLAYCOAT	SC VI.2 & SC VI.4	R336.1225, R336.1901
6. Parachlorobenzotrifluoride (CAS No. 98-56-6)	43.8 pounds per day	Calendar day	FG-DISPLAYCOAT	SC VI.2 & SC VI.4	R336.1224, R336.1225
7. Methylene chloride (CAS No. 75-09-2)	0.2 tpy	12-month rolling time period as determined at the end of each calendar month.	FG-DISPLAYCOAT	SC VI.2 & SC VI.4	R336.1224, R336.1225

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste coatings, reducers, clean-up solvents, etc. and shall store them in closed containers. The permittee shall dispose of all waste coatings, reducers, clean-up solvents, etc. in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**

2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**
3. The permittee shall maintain an acceptable (to the AQD District Supervisor) ambient air boundary. The ambient air boundary shall consist, at a minimum, of a fence along the south property line from the southwest corner of the property to the retention basin located south of the building to prevent public access to the property. **(R 336.1225, R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate the spray booth portions of FG-DISPLAYCOAT unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1331, R 336.1901, R 336.1910)**
2. The permittee shall equip and maintain operate the spray booth portions of FG-DISPLAYCOAT with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the VOC content, water content and density of any coating, reducer, clean-up solvent, etc., as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1224, R336.1225, R 336.1702, R 336.1901)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, reducer, clean-up solvent, etc., including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702, R 336.1901)**
3. The permittee shall keep the following information on a monthly basis for FG-DISPLAYCOAT:
 - a) Gallons of each coating, reducer, clean-up solvent, etc. used.
 - b) VOC and acetone content of each coating, reducer, clean-up solvent, etc. as applied.
 - c) VOC and acetone (combined) mass emission calculations determining the monthly emission rate in pounds and tons per calendar month for each emission unit and tons per calendar month for FG-DISPLAYCOAT.
 - d) VOC and acetone (combined) mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month for each emission unit and FG-DISPLAYCOAT.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1702, R 336.1901)

4. The permittee shall keep the following information on a daily basis for FG-DISPLAYCOAT:
- a) Gallons of each TAC (dimethylethanol amine, xylene, parachlorobenzotrifluoride, and methylene chloride) containing material used.
 - b) Where applicable, gallons of each TAC containing material reclaimed.
 - c) The TAC content in pounds per gallon of each material used.
 - d) Dimethylethanol amine, xylene, and parachlorobenzotrifluoride mass emission calculations determining the daily emission rate in pounds per calendar day.
 - e) Methylene chloride mass emission calculations determining the monthly emission rate in pounds or tons per calendar month.
 - f) Methylene chloride mass emission calculations determining the annual emission rate in pounds or tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1901)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-PROCESS101	36	45	R336.1225, 336.1901, 40 CFR 52.21(c) & (d)
2. SV-PROCESS102	36	45	R336.1225, 336.1901, 40 CFR 52.21(c) & (d)
3. SV-PROCESS103	36	45	R336.1225, 336.1901, 40 CFR 52.21(c) & (d)
4. SV-PROCESS104	36	45	R336.1225, 336.1901, 40 CFR 52.21(c) & (d)
5. SV-PROCESS105	36	45	R336.1225, 336.1901, 40 CFR 52.21(c) & (d)
6. SV-PROCESS111	31	45	R336.1225, 336.1901, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT: All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.2	R336.1205(3)
2. Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.2	R336.1205(3)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **(R 336.1205(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205(3))**
2. The permittee shall keep the following information on a monthly basis for FG-FACILITY:
 - a) Gallons or pounds of each HAP containing material used.
 - b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.

- d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **(R 336.1205(3))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).