

SUPPLEMENT TO PERMIT NO. 109-97A

American Sunroof Company (ASC), Inc.
Livonia, Michigan

April 17, 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, 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 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(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 Department's 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, should be submitted to the appropriate District Supervisor, Air Quality Division or to the Director of Compliance and Enforcement, Air Quality Management Division, Wayne County Department of Environment if the permitted facility is located within Wayne County. At no time shall notifications or submittals to or approvals by both agencies be required pursuant to this permit unless you are otherwise notified in writing by the Air Quality Division.
14. The total volatile organic compound (VOC) emissions from exterior automobile plastic parts Paint Line No. 1 (consisting of paint spray booth, flash tunnel, bake oven, mix room, and clean-up solvents), shall not exceed 14.0 pounds per hour nor 25.0 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month.
15. The total VOC emissions from exterior automobile plastic parts Paint Line No. 2 (consisting of paint spray booth, flash tunnel, bake oven, mix room, and clean-up solvents), shall not exceed 14.0 pounds per hour nor 29.0 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month.
16. The total VOC emissions from exterior automobile plastic parts Paint Line No. 3 (consisting of paint spray booth, flash tunnel, bake oven, mix room, and clean-up solvents), shall not exceed 12.0 pounds per hour nor 28.0 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month.
17. The total VOC emissions from exterior automobile plastic parts Paint Line No. 4 (consisting of paint spray booth, flash tunnel, bake oven, mix room, and clean-up solvents), shall not exceed 14.0 pounds per hour nor 25.0 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month.
18. The total VOC emissions from exterior automobile plastic parts repair booth, shall not exceed 6.0 pounds per hour nor 1.0 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month.
19. The total combined VOC emissions from the all four exterior automobile plastic parts Paint Lines (consisting of all paint spray booths, all flash tunnels, all bake ovens, all mix rooms, one repair booth, and all clean-up solvents), shall not exceed 90.0 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month.
20. The total combined acetone emission rate from all four exterior automobile plastic parts paint lines shall not exceed 15.0 pounds per hour nor 27.0 tons per year, based on 12-month rolling time period as determined at the end of each calendar month.
21. The emission rate of hazardous air pollutants (HAPs), as defined pursuant to Section 112 (b) of the Clean Air Act, shall be less than 9.0 tons per year for any individual HAP and 22.5 tons per year for any combination of HAPs at this stationary source. This annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month.

22. The VOC emission rate from each of the four exterior automobile plastic parts paint lines 1-4 shall not exceed the applicable VOC emission limits specified in Air Pollution Control Rule - R 336.1632, Rule 632(20) - Table 66 (incorporated by reference). All coatings applied in this process must conform to one of the coating categories listed in Rule 632 - Table 66. Each coating must comply with its applicable limit on a calendar day volume weighted average.
23. Coatings shall be applied utilizing high volume low pressure (HVLP) spray guns or similar technology with comparable transfer efficiency. All applicators shall be properly installed, maintained and operated according to manufacturer's specifications.
24. Applicant shall not operate any of the paint lines unless their respective water curtains, and/or dry filters are installed and operating properly.
25. Visible emissions from any portion of each paint line shall not exceed a 6-minute average of 20% opacity, except as specified in Rule 301(1)(a).
26. Rules 1001, 1003, and 1004 - Verification of VOC and/or HAPS emission rates, by testing, from any or all of the four paint lines, 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 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.
27. Applicant shall maintain separate records of the following:
 - A) For each paint of the four paint lines and the repair booth on a daily basis:
 - i. The identification of the paint and the coating category.
 - ii. The VOC content in pounds per gallon of paint (minus water and exempt solvents and with water) as received and as applied.
 - iii. The total amount, in gallons, of paint as received and as applied.
 - iv. The percent by weight of acetone.
 - v. The mixing ratio of paint to solvent, reducer, and thinner.
 - B) For each HAP on a monthly basis:
 - i. The identification of the HAP.
 - ii. The pounds per gallon of each and all HAP's, the percent by weight of each HAP, and the total amount of HAP's containing coating/solvents used in gallons.
 - C) Separate VOC, individual HAP, combined HAP, and acetone emission calculations determining monthly emission rates in tons per month.

- D) Separate VOC, individual HAP, combined HAPs, and acetone emission calculations determining a 12-month rolling time period emission rates as determined at the end of each calendar month emission rate in tons per year.
- E) For each clean-up solvent on a monthly basis:
 - i. The identification of each clean up solvent.
 - ii. The VOC content, in pounds per gallon, of each clean up solvent.
 - iii. The total amount, used in gallons, of each clean up solvent.
- F) Total hours of operation on a monthly basis.
- G) VOC emission calculations determining compliance with Special Condition No. 22. These calculations must be done on a daily basis for each paint line.
- H) VOC emission calculations determining compliance with Special Condition No. 19.

All such records shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.

- 28. The disposal of spent filters and collected coatings/adhesive and waste materials shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.
- 29. The exhaust gases from each paint spray booth, each flash tunnel, each bake oven, and the mix rooms shall be discharged unobstructed vertically upwards to the ambient air from stacks with a maximum diameter of 36 inches at an exit point not less than 34 feet above ground level.
- 30. Applicant shall maintain a current listing of the manufacturer's formulation data for each coating and cleanup solvents.
- 31. The VOC content of the solvent based paint and cleanup solvents 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.
- 32. Within 30 days of issuance of the permit, the applicant shall, label each paint lines and it associated piece of process equipment as to Paint Line Nos. 1, 2, 3, and 4. The applicant will notify the District Supervisor, Air Quality Division, in writing as to the date that the labeling was completed.