

SUPPLEMENT TO PERMIT NO. 164-97

Hispanic Manufacturing Corp.-Gonzales Manuf.
Detroit, Michigan

February 23, 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 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 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. The volatile organic compound (VOC) emission rate from the prime booth portion of the automotive steel parts racks coating line hereinafter "primer booth," shall not exceed 11.8 pounds per hour nor 29.7 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month.
15. The VOC emission rate from the topcoat portion of the automotive steel parts racks coating line, hereinafter "topcoat booth," shall not exceed 13.7 pounds per hour nor 35.7 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month.
16. The VOC content for any topcoat or primer coating used in the automotive steel parts racks coating line, hereinafter "coating process" shall not exceed 2.9 pounds per gallon of coating (minus water) as applied.
17. Visible emissions from any portion of the coating process 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 any or all portions of the coating process by testing, at owner's expense, in accordance with Department requirements, may be required. 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.
19. Applicant shall calculate the VOC emissions from each paint spray booth using the method detailed in Appendix A. Also, the applicant shall maintain a separate record for each calendar month of the following information for each booth:

- A. For each coating used:
 - 1. The identification and the coating category (air-dried or high bake).
 - 2. The amount, in gallons, used (with water).
 - 3. The VOC content in pounds per gallon of coating (minus water and with water) as applied.
- B. VOC emissions calculations determining monthly VOC emission rates in tons per month.
- C. VOC emissions calculations determining a 12-month rolling time period emission rate in tons per year.
- D. Total hours of operation of each of the two paint spray booths.

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

- 20. The disposal of waste coatings, wash solutions and spent filters shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.
- 21. Applicant shall not operate either of the paint spray booths unless their respective dry filters are installed and operating properly.
- 22. The exhaust gases from the coating process shall be discharged unobstructed vertically upwards to the ambient air from stacks with the following parameters:

<u>Stack ID</u>	<u>Maximum Diameter, in.</u>	<u>Minimum Ht. above Ground, ft.</u>
Parts Washer #1	34	40
Parts Washer #2	12	40
Prime booth	34	40
Spray booth Stack #1	26	40
Spray booth Stack #2	26	40
Oven	28	40

- 23. There shall be no volatile organic compounds (VOCs) contained in any wash solvent and/or solution used in the coating process.

Appendix A

VOC's from 2 coating processes

Company: Gonzales Manufacturing
 Permit no. 164-97

Month/year

Process No.1 Primer	A	B	C	D	E = A x B
Coating	Actual gallons used (with water)	Lbs VOC per gallon (with water)	Actual gallons used(minus water)	Lbs VOC per gallon (minus water)	Lbs of VOC

Total gallons minus water used = F = Sum of all C's F Sum of all E's---->

Average VOC content (lbs VOC/gal coating-water) = G = Sum of all E's/F G

Coating VOC limit, pounds per gallon (minus water)=H. G can = H or < H H 2.9

Total tons VOC emitted from coatings = J = Sum of all E's/2000 J

12 month rolling time period emissions in tons = AA = (total of 11 previous months + J) AA

12 month rolling time period limit (tons) = BB, AA can =BB or <BB BB 29.7

Process No.2 Topcoat	K	L	M	N	P = K x L
Coating	Actual gallons used (with water)	Lbs VOC per gallon (with water)	Actual gallons used(minus water)	Lbs VOC per gallon (minus water)	Lbs of VOC

Total gallons minus water used = Q = Sum of all M's Q Sum of all P's---->

Average VOC content (lbs VOC/gal coating-water) = R = Sum of all P's/Q R

Coating VOC limit, pounds per gallon (minus water) = S. R can = S or < S S 2.9

Total tons VOC emitted from coatings = T = Sum of all P's/2000 T

12 month rolling time period emissions in tons = CC =(total of 11 previous months + T) CC

12 month rolling time period limit (tons) = DD, CC can =DD or <DD DD 35.7

Gonzales Manufacturing Corp.-
Hispanic Manufacturing Corp.
Permit No. 164-97
Page 6
February 23, 1998