

SUPPLEMENT to PERMIT No. 26-97

Knape Industries, Inc.  
Rockford, Michigan  
SRN: N5240

January 19, 2001

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 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 Department's 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 six-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\*\*\*\*\*

This permit covers the following emission units which are comprised of the following equipment:

Emission Unit ID	Equipment Description
FG-VACUUM	Three (3) vacuum metallizers installed prior to 1967, therefore grandfathered FROM New Source Review.
FG-PAINTINGA	Paint booths and machines installed prior to 1967, therefore grandfathered from New Source Review. Booths B1 through B8, Paint Machines M1 through M5. and Ovens O1, O2 and O3.
FG-PAINTINGB	Paint booths, machines installed or modified after 1967. Booths B9 through B16, and Paint Machines M6 through M8.
FG-MASKWASHERS	Four (4) solvent based mask washers and two (2) solventless mask washers, exempt from NSR pursuant to Rule 281(h).
EU-BOILER	One (1) steam generating boiler (15 HP), exempt from NSR pursuant to Rule 282(a).

**Emission Limits**

**STATIONARY SOURCE**

Pollutant	Equipment	Limit	Time Period	Compliance Method	UAR(s)
1. Volatile Organic Compounds (VOCs)	Stationary Source	90 tons	12-month rolling total	Special Condition No. 9	R 336.1205
2. Individual Hazardous Air Pollutants (HAPs)	Stationary Source	9 tons	12-month rolling total	Special Condition No. 9	R 336.1205
3. Aggregate HAPs	Stationary Source	22.5 tons	12-month rolling total	Special Condition No. 9	R 336.1205

**FG-PAINTINGB**

Pollutant	Equipment or Operation	Limit	Time Period	Compliance Method	UAR(s)
4. VOC	FG-PAINTINGB	240 pounds	Per calendar day	Special Condition No. 9	R 336.1702(d)
5. VOC	FG-PAINTINGB	23 tons	Per 12-month rolling total	Special Condition No. 9	R 336.1702(d)

### Equipment

6. Permittee shall not operate any equipment as referenced in FG-PAINTINGB unless the corresponding dry filters are in place and operating properly.  
(R 336.1224, R 336.1301, R 336.1331, R 336.1910)

### Process/Operational Limits

7. Permittee shall collect and store waste coatings and solvents in closed containers to minimize the release of air contaminants.  
(R 336.1370, R 336.1702(d))

### Testing

8. The VOC content 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 may alternatively be determined from manufacturer's formulation data.  
(R 336.1205, R 336.1225, R 336.1702(d))

### Recordkeeping/Reporting/Notification

9. Permittee shall maintain the following records and emission calculations:
- a) The identity of each coating or solvent used in the stationary source and the coating category to which it belongs;
  - b) The VOC content of each coating or solvent used in the stationary source, in pounds per gallon with water, as received;
  - c) The VOC content of each coating used in the stationary source, in pounds per gallon without water, as applied;
  - d) The daily usage rate in gallons for each coating or solvent used in FG-VACUUM, FG-PAINTINGA, FG-PAINTINGB and FG-MASKWASHERS;
  - e) The daily average VOC emissions in pounds per gallon, minus water, as applied, separately for each coating category identified above;
  - f) The HAP content of each coating or solvent used at the stationary source, including grandfathered and exempt sources for each individual HAP and for all HAPs in aggregate;
  - g) Individual and aggregate HAP mass emission calculations determining the yearly emission rates in tons per 12-month rolling time period as determined at the end of each calendar month from the stationary source, including grandfathered and exempt sources;
  - h) Total VOC mass emission calculations separately for FG-PAINTINGB determining calendar day emissions in pounds;
  - i) Total VOC mass emission calculations separately for FG-PAINTINGB determining the yearly emission rate in tons per 12-month rolling time period as determined at the end of each calendar month;
  - j) Total VOC mass emission calculations determining the yearly emission rates in tons per 12-month rolling time period as determined at the end of each calendar month from the stationary source, including grandfathered and exempt sources;

The applicant shall prepare a summary report of these records each calendar quarter in a format acceptable to the District Supervisor. All records and reports shall be maintained on site for a period of five years and made available to the Department upon request.

(R 336.1205, R 336.1225, R 336.1702(d))

### Stack/Vent Restrictions

Stack/Vent ID	Minimum Height Above Ground Level (feet)	UAR(s)
10. Stacks:S11 through S24	27	R 336.1901
The exhaust gases from these stacks/vents shall be discharged unobstructed vertically upwards to the ambient air.		