

SUPPLEMENT TO PERMIT NO. 470-97

Dapco Industries
Dexter, Michigan

March 2, 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(6)(b)(i) 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(6)(b)(ii) - 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(7) 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.
 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. The methylene chloride emission rate from the Finishing Equipment, Inc., Model AE-2D-O-SP vapor degreaser, hereinafter "degreaser", shall not exceed 6.33 pounds per hour nor 9.5 tons per year based on a 12-month rolling time period as determined at the end of each calendar month.
14. Applicant shall not use more than 1,716 gallons of methylene chloride per year based on a 12-month rolling time period as determined at the end of each calendar month. The amount of methylene chloride used shall be determined by subtracting the amount of methylene chloride drained from the degreaser from the amount of methylene chloride added to the degreaser each time cleaning solvent is added or removed. All measurements shall be made after filling all sumps and storage tanks to the working level. A monthly record of the amounts of cleaning solvent drained from and added to the degreaser shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request.
15. Applicant shall not degrease parts for more than 10 hours per day or more than 3,000 hours per year based on a 12-month rolling time period as determined at the end of each calendar month. The degreaser shall remain powered on at all times unless it is necessary to power off for maintenance purposes. A report of daily and monthly hours of operation shall be maintained and kept on file for a minimum of two years and shall be made available to the Air Quality Division upon request.
16. Applicant shall determine the amount of solvent used each month, and report monthly solvent usage and related parameters on the worksheets in Appendices A through C, or equivalent. The solvent usage shall be reported to the District Supervisor of the Air Quality Division within 30 calendar days after the end of the month in which the data were collected. After 6 months of satisfactory reporting, the applicant may make a written request to the District Supervisor of the Air Quality Division for a reduction in the reporting frequency, which will not be unreasonably withheld.
17. The applicant shall comply with the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as specified in 40 CFR 63.463(a)-(f) for the degreaser. The requirements include, but are not limited to, the following (option #4):
 - (1) A freeboard ratio of 1.0.
The ratio of the solvent cleaning machine freeboard height to the smaller interior dimension (length, width or diameter) of the solvent cleaning machine shall not exceed 1.0.
 - (2) A superheated vapor zone.
Applicant shall maintain a temperature in the center of the superheated vapor zone at least 10°F above the solvent's boiling point (106°F). The temperature at the center of the superheated solvent vapor zone shall be monitored weekly while the degreaser is in idling mode.
 - (3) A reduced room draft.
The direction of air movement in the enclosure shall be determined on a monthly basis by slowly rotating a velometer inside the entrance to the enclosure until the maximum wind speed is located. A monthly visual inspection

shall be made of the enclosure to determine if it is free of cracks, holes and other defects.

18. Applicant shall not operate the degreasers except in compliance with the required work and operational practices of 40 CFR 63.463(d)(1)-(12). The required work and operational practices include but are not limited to:
 - (1) Use of a downtime and idling mode cover that completely covers the degreaser openings when in place and is free of cracks, holes, and other defects.
 - (2) The parts baskets or parts being cleaned shall not occupy more than 50% of the solvent/air interface area.
 - (3) Any spraying operations shall be done within the vapor zone.
 - (4) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being moved from the degreaser.
 - (5) Parts or parts baskets shall not be removed from the degreaser until condensation or dripping has stopped.
 - (6) During startup the primary condenser shall be turned on before the sump heater.
 - (7) During shutdown of the degreaser, the sump heater shall be turned off, and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - (8) When solvent is added to or drained from the degreaser, the solvent shall be transferred using threaded or other leakproof couplings and closed plumbing directly to the sump or waste drum and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - (9) The degreaser shall be maintained as recommended by the manufacturer of the equipment.
 - (10) Each operator of the degreaser shall complete and pass the degreaser operating procedures tests as given in Appendix B of the NESHAP if requested by the Air Quality Division.
 - (11) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers.
 - (12) Sponges, fabric, wood, and paper products shall not be cleaned.

19. Monitoring and recording of emissions and operating information is required to comply with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR, Part 60, Subparts A and T. All source emissions data and operating data shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request. Monitoring and recording requirements include but are not limited to:
 - a. Weekly monitoring and recording of the temperature at the center of the air blanket of each degreaser while the degreaser is in idling mode.
 - b. Monthly monitoring and recording of the actual wind speed in the solvent cleaning machine enclosure area.
 - c. Monthly inspection and recording of the enclosure area to ensure it is free of cracks, holes and other defects.
 - d. Monthly monitoring and recording of the hoist speeds, except as allowed by 40 CFR 63.466(c)(1)-(4).

- e. An estimate of annual cleaning solvent total consumption.
20. Rules 1001, 1003, 1004 - Verification of methylene chloride emission rates from the vapor degreaser by testing, at the owners expense, in accordance with Commission requirements, may be required. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the District Supervisor, Air Quality Division, and results shall be submitted within 120 days of the written requirements for such verification.
 21. The general room ventilation and degreaser exhaust gases shall be discharged unobstructed vertically upwards to the ambient air from the two stacks, each having a maximum diameter of 14 inches, not including any rain protection sleeve(s). Stack-1 (south stack), for the general room ventilation, shall have an exit point not less than 50 feet above the ground. Stack-2 (north stack), for the degreaser, shall have an exit point not less than 60 feet above the ground.
 22. Applicant shall not operate the vapor degreaser unless all provisions of Rule 708 are met by the degreaser. If a conflict is found in the requirements between Rule 708 and 40 CFR 63, the federal standard shall take precedent over the State standard.
 23. Applicant shall equip and maintain a temperature monitoring device to monitor the superheated vapor zone temperatures.
 24. Applicant shall cease operation of all degreasing equipment not permitted under this permit, including the degreasers identified in Permit to Install No. 521-96, within 2 weeks of start-up of this degreaser. Applicant shall physically disconnect and render inoperable all degreasing equipment not permitted under this permit within two weeks of shut-down of the equipment.