

SUPPLEMENT TO PERMIT NO. 111-98

Brighton Interior Systems  
Brighton, Michigan

July 20, 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 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 Departments' 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 this 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 6-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) visible emission limit specified as a special 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).

### SPECIAL CONDITIONS

14. The total combined volatile organic compound (VOC) emission rate from the entire automobile interior plastic parts spray coating operation consisting of one (1) automatic spray coating unit and one electric oven including clean up and purge solvent usage, hereinafter, "coating process", shall not exceed 4.4 pounds per hour nor 8.5 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month.
15. The total combined acetone emission rate from the coating process, shall not exceed 2.0 pounds per hour nor 2.0 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month.
16. 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).
17. The VOC emission rate from the coating process 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) for high bake interior parts. All coatings applied in this coating process must conform to one of the high bake interior parts coating categories listed in Rule 632 - Table 66. Each coating must comply with its applicable category limit on an instantaneous basis.
18. Rules 1001, 1003 and 1004 - Verification of VOC, acetone, and/or HAPs 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 for operating approval. The testing shall be conducted within 60 days following receipt of the written notification of the requirement. 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 keep separate records of the following for the coating process:
  - a) For each coating sprayed:
    - i) The coating identification and the coating category (as per Rule 632).
    - ii) The number of gallons applied.
    - iii) The mixing ratio of coating to solvent, reducer, and thinner.
    - iv) The VOC content in pounds per gallon of coating (minus water) as received and as applied.
    - v) The VOC content in pounds per gallon of reducer and the amount, in gallons, used.
    - vi) The hours of operation of each of the coating process.
  - b) Monthly VOC and acetone emissions calculations determining emission per month and per year on a 12-month rolling time period (to show compliance with Special Condition No. 14 and 15).

- c) VOC emission calculations determining compliance with Special Condition No. 18.
- d) Monthly usage rate, recovery rate, and VOC content records of all purge and/or clean-up solvents used.

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.

- 20. The VOC content, water content, density and solids weight and volume fractions of any coating or reducer as applied and as received shall be determined using federal Reference Test Method 24. Upon prior approval of the District Supervisor, Air Quality Division, the coating parameters (VOC content, water content, density, solids weight fraction, solid volume fraction) of any coating or reducer may alternatively be determined from manufacturer's formulation data.
- 21. Applicant shall not operate the automatic spray booth unit unless its exhaust filter are in place and operating properly.
- 22. The exhaust gases from the automatic spray coating unit shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 24 inches and minimum stack heights of 38 feet above ground level.
- 23. The disposal of waste coatings, reducers, cleanup solvents and/or wash solvents shall be performed in a manner which minimizes the introduction of air contaminants to the outer air.
- 24. All purge solvents and waste coatings from the applicators used for the coating process shall be captured and stored in closed containers and disposed in an acceptable manner in compliance with all applicable rules and regulations.
- 25. Applicant shall maintain a current listing of the chemical composition of each coating and reducer used at the facility, including the weight percent of each compound.