

SUPPLEMENT TO PERMIT NO. 252-98
Hydra-lock Corporation
Mt Clemens, Michigan
September 14, 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 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 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) 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.

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1. The Total chromium emission from the two small hard chrome plating tanks shall not exceed 30 micrograms per cubic meter, corrected to 70 degrees Fahrenheit and 29.92 inches Hg. This condition is necessary to assure compliance with the emission limits which have been established pursuant to Rule 230 and also to assure compliance with National Emission Standards for Hazardous Air Pollutants (NESHAPs) as specified in 40 CFR, Part 63, Subparts A and N.
2. Applicant shall not operate the two small hard chrome plating tanks unless the composite mesh pad scrubber is installed and operating properly. This condition is necessary to assure compliance with National Emission Standards for Hazardous Air Pollutants (NESHAPs) as specified in 40 CFR, Part 63, Subparts A and N, and also to comply with the emission limits which have been established pursuant to Rule 230.
3. Applicant shall equip and maintain the control with a pressure drop indicator to measure the pressure drop across the control. This condition is necessary to assure compliance with National Emission Standards for Hazardous Air Pollutants (NESHAPs) as specified in 40 CFR, Part 63, Subparts A and N.
4. Operator shall perform inspections as follows:
 - a. Inspection of the mesh pads shall be conducted quarterly.
 - b. Wash down of the mesh pads shall be conducted in accordance with the manufacturer's recommendations.
 - c. If the pressure drop across the air pollution control device varies by more than + or - 1 inch of water gauge, from the pressure drop determined during initial testing, the variation shall be documented, and the operation and maintenance procedures shall be reviewed. Any corrective action shall be documented.

This condition is necessary to assure compliance with National Emission Standards for Hazardous Air Pollutants (NESHAPs) as specified in 40 CFR, Part 63, Subparts A and N.
5. On a quarterly basis, the operator shall visually inspect the control device to ensure proper drainage, to ensure that there is no chromic acid build-up on the mesh pads, and that the structural integrity is sound. This condition is necessary to assure compliance with National Emission Standards for Hazardous Air Pollutants (NESHAPs) as specified in 40 CFR, Part 63, Subparts A and N.
6. Applicant shall maintain records of inspections required to comply with applicable Work Practice Standards of 40 CFR 63.342(f). Each inspection record shall

- identify the device inspected, the date, approximate time of inspection and a brief description of the working condition of the device during the inspection. Applicant shall also record any actions taken to correct deficiencies found during the inspection. Records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request. This condition is necessary to assure compliance with National Emission Standards for Hazardous Air Pollutants (NESHAPs) as specified in 40 CFR, Part 63, Subparts A and N.
7. Monitoring and recording of emissions, operating and maintenance information is required to comply with National Emission Standards for Hazardous Air Pollutants (NESHAPs) as specified in 40 CFR, Part 63, Subparts A and N. All source emissions and operating and maintenance data shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request.
 8. Within 30 calendar days of the date of permit approval, applicant shall prepare and submit an operation and maintenance plan including the start-up, shut-down, and malfunction plan of the control to the District Supervisor for approval. The plan shall also include a standardized checklist to document the operation and maintenance of the control which addresses a systematic procedure for identifying malfunctions, reporting process to the supervisors and other actions to be followed to ensure that the control or process malfunctions due to poor maintenance or other preventable conditions do not occur. This condition is required to assure compliance with National Emission Standards for Hazardous Air Pollutants (NESHAPs) as specified in 40 CFR, Part 63, Subparts A and N.
 9. Within 180 days after commencement of trial operation, verification of Total chromium emission rates from the two small hard chrome plating tanks by testing, at owner's expense, in accordance with 40 CFR, Part 63, Subparts A and N, will be required. Verification of emission rates includes the submittal of a complete report of the initial performance test results. Applicant shall notify the District Supervisor, in writing, of the intention to conduct a performance stack test at least 60 calendar days before the test is scheduled to begin, in accordance with 40 CFR 63.347(d). Stack testing procedures and the location of stack testing ports shall be in accordance with the applicable federal Reference Methods, 40 CFR, Part 63, Appendix A. No less than 30 days prior to testing, a complete stack testing plan must be submitted to the Air Quality Division. The final plan must be approved by the Air Quality Division prior to testing. Within 60 days following the completion of performance test, the applicant shall submit the results of the initial performance test to the District Supervisor. This condition establishes performance testing requirements pursuant to Rules 1001, 1003, and 1004.
 10. The exhaust gases from the two small hard chrome plating tanks shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 10 inches at an exit point not less than 30 feet above

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ground level. This condition is necessary to assure compliance with the requirements of Rule 230 and also to assure compliance with National Emission Standards for Hazardous Air Pollutants (NESHAPs) as specified in 40 CFR, Part 63, Subparts A and N.