

SUPPLEMENT TO PERMIT NO. 264-98
System 2/90 Inc.
Grand Rapids, Michigan
October 13, 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.
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

1. The volatile organic compound (VOC) emission rate from the two quad spraybooths, one rectangular spraybooth, bench booth, each controlled by a fabric filter, and the hydrographic application process and 2 infrared ovens, hereinafter referred to as "plastic sign coating process," shall not exceed 12.4 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. This condition is necessary to assure compliance with Rules 230, 702, and 901.
2. The VOC emission rate from the use of cleanup and purge solvents shall not exceed 2 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month. This condition is necessary to assure compliance with Rules 230, 702, and 901.
3. The hazardous air pollutant (HAP) emissions, as defined pursuant to Section 112(b) of the Clean Air Act, shall be less than 9 tons per year for any individual HAP and 22 tons per year for any combination of HAPs at this stationary source. The annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month. This condition is necessary to assure compliance with the emission limits which have been established pursuant to Rule 205(3).
4. Verification of VOC and HAP emission rates from the plastic sign 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. This condition establishes performance testing requirements pursuant to Rules 1001, 1003, and 1004.
5. 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. This condition is necessary to assure compliance with the emission limits which have been established pursuant to Rule 702.
6. The applicant shall keep the following information on a monthly basis for the plastic sign coating process:

- A. Gallons (including water) of each coating used.
- B. VOC content of each coating (with water and minus water) as received and as applied.
- C. VOC mass emission calculations determining the monthly emission rate in tons per month.
- D. VOC mass emission calculations determining the yearly emission rate in tons per 12 month rolling time period as determined at the end of each calendar month.

The records shall be kept in the format specified in Appendix A or an alternate format that has been approved by the Air Quality Division District Supervisor. The records shall be kept on site for a period of at least five years and made available to the Department upon request. This condition is necessary to assure compliance with the emission limits which have been established pursuant to Rules 230, 702, and 901.

- 7. The applicant shall keep the following information on a monthly basis for the use of cleanup and purge solvents associated with the plastic sign coating process:
 - A. Gallons used and gallons reclaimed of each solvent.
 - B. VOC content, in pounds per gallon, of each solvent.
 - C. VOC mass emission calculations determining the monthly emission rate in tons per month.
 - D. VOC mass emission calculations determining the yearly emission rate in tons per 12 month rolling time period as determined at the end of each calendar month.

The records shall be kept in the format specified in Appendix A or an alternate format that has been approved by the Air Quality Division District Supervisor. The records shall be kept on site for a period of at least five years and made available to the Department upon request. This condition is necessary to assure compliance with the emission limits which have been established pursuant to Rule 230, 702, and 901.

- 8. The applicant shall keep the following information on a monthly basis for the stationary source:
 - A. Gallons used of each material.

- B. Gallons reclaimed or each material, where applicable -- typically purge solvent.
- C. HAP content, in pounds per gallon, of each material.
- D. Calculations determining both the individual and aggregate HAP emission rates in tons per month.
- E. Calculations determining both the individual and aggregate emission rates in tons per 12 month rolling time period as determined at the end of each calendar month.

The records shall be kept in the format specified in Appendix B or an alternate format that has been approved by the Air Quality Division District Supervisor. The records shall be kept on site for a period of at least five years and made available to the Department upon request. This condition is necessary to assure compliance with the emission limits which have been established pursuant to Rule 205.

- 9. The applicant shall maintain a current listing of the manufacturer's formulation data for each coating, reducer, solvent, etc. used in the plastic sign coating process. This condition is necessary to assure compliance with Rules 230, 702, and 901.
- 10. Applicant shall not operate either of the quad booths, the rectangular booth, or the bench booth unless its respective exhaust filter is in place and operating properly. This condition is necessary to assure compliance with Rule 910.
- 11. Applicant shall equip and maintain all paint spray booths with high volume low pressure (HVLP) spray guns or equivalent technology with comparable transfer efficiency. All coating applicators shall be properly installed, maintained, and operated according to manufacturer's specifications. This condition is necessary to assure compliance with best available control technology (BACT) which has been established pursuant to Rule 702.
- 12. All purge solvents and waste coatings from all coating applicators used for the plastic sign coating process shall be captured and stored in closed containers and disposed of in an acceptable manner in compliance with all applicable state rules and federal regulations. This condition is necessary to assure compliance with best available control technology (BACT) which has been established pursuant to Rule 702.
- 13. The exhaust gases from the plastic sign coating process shall be discharged unobstructed vertically upwards to the ambient air from stacks with the following dimensions:

Process	Minimum Height	Maximum Diameter
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Quad Booth 1	40. feet	34 inches
Quad Booth 2	40. feet	34 inches
Rectangular Booth	40. feet	34 inches
Bench Booth	40. feet	12 inches
Hydrographic Application	40. feet	34 inches
Infrared Oven 1	40. feet	6 inches
Infrared Oven 2	40. feet	6 inches

This condition is necessary to assure compliance with Rules 230 and 901.