

SUPPLEMENT to PERMIT No. 274-98A
Adept Plastics Finishing, Inc.
Wixom, Michigan
March 28, 2001

GENERAL CONDITIONS

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. [R 336.1201(1)]
2. 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. [R 336.1201(4)]
3. 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. [R 336.1201(6)(b)]
4. 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. [R 336.1201(8), Section 5510 of Act 451, P.A. 1994]
5. 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. [R 336.1219]
6. 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. [R 336.1901]
7. 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 no 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 ten days, with the information required in this rule. [R 336.1912]
8. 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, PA 1994 of the Federal Clean Air Act.
 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
 10. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, PA 1994, and the rules promulgated thereunder.
 11. 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. [R 336.1301]
 - 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.
 12. 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). [R 336.1370]
 13. 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. [R 336.1201(1)]
 14. 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. [R 336.2001]

SPECIAL CONDITIONS
 March 8, 2001

This permit covers the coating of automotive and non-automotive plastic parts in the flexible group and emission units defined in the following table.

Flexible Group ID	Emission Unit ID	Associated Equipment	Stack ID
FG-COATLINE	EU-MONORAIL	Monorail Booth #1 (waterwash) Monorail Booth #2 (waterwash)	SV0001 SV0002
		Monorail Cure Oven	SV0003
	EU-BATCH BOOTHS	Batch Booth #1 (dry filters) Batch Booth #2 (dry filters) Batch Booth #3 (R & D) (dry filters) Batch Booth #4 (dry filters)	SV0004 SV0005 SV0006 SV0007
		North Cure Oven South Cure Oven	SV0008 SV0009

Emission Limits

STATIONARY SOURCE

Pollutant	Equipment	Limit	Time Period	Compliance Method	Applicable Rules
1. Individual Hazardous Air Pollutants (HAPs)	Stationary Source	9.0 tons	12-month rolling time period	Special Condition No. 20	R 336.1205(3)
2. Aggregate HAPs	Stationary Source	22.5 tons	12-month rolling time period	Special Condition No. 20	R 336.1205(3)

FG-COATLINE

Pollutant	Equipment	Limit	Time Period	Compliance Method	Applicable Rules
3. Volatile Organic Compounds (VOCs)	FG-COATLINE	30.0 pounds	per hour	Special Condition No. 21 General Condition No. 14	R 336.1225 R 336.1901
4. VOCs	FG-COATLINE	49.0 tons	12-month rolling time period	Special Condition No. 21	R 336.1205 R 336.1702(a)
5. VOCs	Each Individual Spray Booth	29.5 tons	12-month rolling time period	Special Condition No. 21	R 336.1205 R 336.1702(a)
6. VOCs	Automotive Air-dried Prime - exterior plastic parts coating (black/red)	5.52 pounds per gallon (minus water), as applied *	Calendar day – (volume-weighted average)	Special Condition No. 21	R 336.1702(d)
7. VOCs	Automotive Air-dried Basecoat – interior/exterior plastic parts coating (black/red)	5.75 pounds per gallon (minus water), as applied *	Calendar day – (volume-weighted average)	Special Condition No. 21	R 336.1702(d)
8. VOCs	Automotive Air-dried Basecoat –interior/exterior plastic parts coating (non-red/black)	5.0 pounds per gallon (minus water), as applied *	Calendar day – (volume-weighted average)	Special Condition No. 21	R 336.1702(d)
9. VOCs	Automotive Air-dried Clearcoat –interior/exterior plastic parts coating	4.5 pounds per gallon (minus water), as applied *	Calendar day – (volume-weighted average)	Special Condition No. 21	R 336.1702(d)
10. VOCs	Non-automotive Prime - plastic parts coating	6.55 pounds per gallon (minus water), as applied	Instantaneous	Special Condition No. 21	R 336.1702(a)
11. VOCs	Non-automotive Basecoat – plastic parts coating	5.95 pounds per gallon (minus water), as applied	Instantaneous	Special Condition No. 21	R 336.1702(a)
* Low use coatings that total 55 gallons or less (sum of all coating categories) per rolling 12-month period may be used and are exempt from the VOC content limits. (R 336.1632)					

Material Usage Limits

12. The applicant shall not use more than 36.0 pounds of Diethylene Glycol Monobutyl Ether (CAS No. 112-34-5) per 24-hour calendar day in FG-COATLINE. **(R 336.1225 and R 336.1901)**

Process/Operational Limits

13. The collection and disposal of waste coatings, catalysts, reducers, and solvents shall be performed in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1205, R 336.1225, R 336.1702(a), and R 336.1901)**
14. The oven portions of FG-COATLINE shall not cure parts at temperatures greater than 194°F when air-dried automotive coatings are being cured. **(R 336.1205, R 336.1225, R 336.1702(a), and R 336.1901)**

Equipment

15. The applicant shall not operate any spray booth portion of FG-COATLINE unless its respective waterwash systems or dry panel filters are in place and operating properly. **(R 336.1301, R 336.1331, R 336.1901, and R 336.1910)**
16. The applicant shall equip and maintain the spray booth portions of FG-COATLINE with high volume low pressure (HVLP) spray guns or equivalent technology with comparable transfer efficiency. **(R 336.1205, R 336.1225, and R 336.1702(a))**

Testing

17. The VOC content of any coating, catalyst, reducer, and solvent, as applied and as received, shall be determined using federal Reference Test Method 24 or other EPA approved reference method. Upon prior approval of the District Supervisor, Air Quality Division, VOC content may alternatively be determined from manufacturer's formulation data. **(R 336.1225, R 336.1702(a), and R 336.1901)**

Monitoring

18. The applicant shall monitor and record the temperature in the cure oven portions of FG-COATLINE on a continuous basis in a manner and with instrumentation acceptable to the District Supervisor, Air Quality Division. In addition, the applicant shall keep a record of the type of parts being cured in each oven. All temperature data and parts records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1225, R 336.1702(a), and R 336.1910)**

Recordkeeping/Reporting/Notification

19. The applicant shall maintain a current listing from the manufacturer, of the chemical composition of each coating, catalyst, reducer, cleanup solvent, etc., including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both. **(R 336.1225, R 336.1702(a), and R 336.1901)**
20. The applicant shall keep a record for each calendar month of the following information for the stationary source:
 - a) For each HAPs-containing material used at the facility:
 1. The amount used in gallons of each material.
 2. The HAP content, in pounds per gallon, of each material.
 - b) Individual and aggregate HAP emission calculations, determining the monthly emission rate in tons per month and the 12-month rolling average HAP emission rate at the end of each calendar month in tons per year.

The records are for the purpose of compliance demonstration and shall be kept in a format that has been approved by the Air Quality Division District Supervisor. All such records shall be kept on file for a period of at least five years and made available to the District Supervisor upon request. **(R 336.1205(3))**

21. The applicant shall keep a record for each calendar month of the following information for FG-COATLINE:
 - a) Daily hours of operation for each spray booth.
 - b) Daily for each coating, catalyst, reducer, and cleanup/purge solvent used:
 1. The coating, reducer, cleanup, and purge solvent identification and coating category.
 2. The amount used in gallons (with water).
 3. The VOC content in pounds per gallon (minus water and with water), as received and as applied.
 4. For each calendar day, a calculation of the volume-weighted average VOC content in pounds per gallon (minus water), as applied, for the applicable coating categories.
 5. The Diethylene Glycol Monobutyl Ether (CAS No. 112-34-5) content in pounds per gallon (with water) as received and as applied.
 6. The amount used in pounds of Diethylene Glycol Monobutyl Ether (CAS No. 112-34-5) on a 24-hour calendar day basis.
 - c) Gallons used of the low use coatings on a monthly, and a 12-month rolling time period for FG-COATLINE.
 - d) Calculate the pounds VOC per hour based on a daily average for FG-COATLINE.

- e) VOC emission calculations determining the calendar month emission rate in tons per month, and a 12-month rolling time period emission rate in tons per year for FG-COATLINE and each individual spray booth.

The records are for the purpose of compliance demonstration and shall be kept in a format that has been approved by the Air Quality Division District Supervisor. All such records shall be kept on file for a period of at least five years and made available to the District Supervisor upon request. **(R 336.1225, R 336.1702(a), R 336.1702(d), and R 336.1901)**

Stack/Vent Conditions

22. The exhaust gases from FG-COATLINE shall be discharged unobstructed vertically upwards to the ambient air from stacks with the following parameters: **(R 336.1225, R 336.1901, and 40 CFR 52.21(c) &(d))**

Stack ID	Description	Maximum Diameter (inches)	Minimum Exit Point above Ground Level (feet)
SV0001	Monorail Booth #1 Exhaust	36	29.5
SV0002	Monorail Booth #2 Exhaust	36	29.5
SV0003	Monorail Cure Oven Exhaust	12	29.5
SV0004	Batch Booth #1 Exhaust	24	29.5
SV0005	Batch Booth #2 Exhaust	24	29.5
SV0006	Batch Booth #3 (R & D) Exhaust	24	29.5
SV0007	Batch Booth #4 Exhaust	24	29.5
SV0008	North Cure Oven Exhaust	12	29.5
SV0009	South Cure Oven Exhaust	12	29.5