

SUPPLEMENT TO PERMIT NO. 309-99

Connolly North America, Inc.
12225 Oakland Park Boulevard
Highland Park, Michigan 48203
August 10, 2000

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 condition 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) A 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).
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
 (15 special conditions)

1. The following table constitutes the equipment covered by this permit for Connolly North America. The roll applicator area and the four rotary spraybooths are used to coat leather hides. (R336.1201)

Table 1

Flexible Group ID:	Emission Unit ID:	Equipment Description
FG – Group 1	EU-Roll	One leather hide roll applicator table and infrared oven. Emissions from roll applicator table are vented in plant.
	EU-Spray	Leather hide coating line consisting of Spraybooth 1, Infrared Oven 1, Spraybooth 2, Infrared Oven 2, Spraybooth 3, Infrared Oven 3, Spraybooth 4, and Infrared Oven 4 all operated in series
	EU-Tunnel	One tunnel dryer used to cure coated hides from both EU – roll and EU – spray. (natural gas fired)

2. For purposes of this permit to install, all requirements for notifications or submittal of records to or approvals by the District Supervisor, Air Quality Division should be submitted to the Director of Compliance and Enforcement, Air Quality Management Division, Wayne County, Department of Environment unless you are otherwise notified in writing by the Air Quality Division. At no time shall notifications or submittals to or approvals by both agencies be required pursuant to this permit. ACT 451, R324.5542
3. The total volatile organic compound (VOC) emission rate from FG – Group 1, consisting of the emission units as listed in Table 1, shall not exceed 27.6 pounds per hour, nor 71.9 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. (R336.1205, R336.1225, R336.1702a)
4. The total VOC emission rate from EU – Roll, shall not exceed 5.0 pounds per hour nor 13.0 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. (R336.1205, R336.1225, R336.1702a)
5. The applicant shall not operate neither EU-Roll nor EU-Spray in excess of 5200 hours per year based upon a 12-month rolling time period. (R336.1205)
6. The VOC content of the coatings applied by FG-Group 1 shall not exceed 1.0 pounds of VOC per gallon of coating, minus water, as applied. (R336.1702)
7. The VOC emissions rate from neither EU – Roll nor EU - Spray shall not exceed 0.12 pounds per whole hide, based upon a monthly averaging period. (R336.1702a)
8. The hazardous air pollutant (HAP) emissions, as defined pursuant to Section 112(b) of the Clean Air Act, shall be less than 9.0 tons per year for any individual HAP and 22.0 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. (336.1205(3))

9. The applicant shall keep a separate record for EU - Roll and EU – Spray of the following information: (R336.1205, R336.1225, R336.1702a)
 - A. For each coating applied on a monthly basis:
 1. Specific identification of type, category and density for each coating used.
 2. The VOC content in pounds of coating (minus water) as received and as applied.
 3. The VOC content in pounds per gallon for any reducers, thinners and catalyst used.
 4. The amount used in gallons of all coatings.
 - B. The daily hours of operation
 - C. The number of hides coated per calendar month.
 - D. The VOC emission calculations determining a calendar month emission rate in tons per month and a 12-month rolling time period emission rate in tons per year.
 - E. The calculated monthly average VOC emission rate in pounds of VOC per whole hide.

All such records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request. (R336.1205, R336.1225, R336.1702a)

10. Applicant shall keep a separate record of the following information for the stationary source:
 - A. The gallons used of each material.
 - B. The gallons reclaimed of each material, where applicable, typically cleanup or purge solvent.
 - C. The HAP content, in pounds per gallon, of each material.
 - D. Individual and aggregate HAP emission calculations determining the monthly emission rate in tons per month.
 - E. Individual and aggregate HAP emission calculations determining the yearly emission rate of each in tons per 12 month rolling time period as determined at the end of each calendar month.

All such records shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request. (336.1205(3))

11. A report demonstrating compliance with the applicable VOC emission limits specified in Special Condition Nos. 2, 3, 4, 5, 6, 7 and 8 shall be prepared in an acceptable format within 30 days following the end of the quarter in which the data were collected. This information shall be kept on file for a period of at least two years from the date of record and made available to the Air Quality Division upon request. (R336.1205, R336.1225, R336.1702)

12. The VOC content of the coatings as received and as applied shall be determined using Federal Reference Test Method No 24. Upon prior approval of the Division, VOC content may be determined alternatively from manufacturers' formulation data. (R336.1225, R336.1702a)
13. Applicant shall not operate the rotary spray booth portion of any EU - Spray unless the transfer efficiency enhancing computerized light table, or equal technology, and the wet scrubbers are installed and operating properly. (R336.1205, R336.1331, R336.1702)
14. The particulate emissions rate from EU - spray portions of FG – Group 1 shall not exceed 0.014 pounds per 1000 pounds of gases, calculated on a dry basis, 5.57 pounds per hour, or 14.5 tons per year based on a 12-month rolling time period as determined at the end of each calendar month. (R336.1205, R336.1331 and 40 CFR 52.21 Subpart (c) and (d))
15. The exhaust gases from the EU - Spray shall be discharged unobstructed vertically upwards to the ambient air from stacks with maximum diameters and with exit points above ground level not less than as shown in the following Table 2: (R336.1901)

Table 2

Stack ID	Equipment Description	Minimum Stack Height (feet)	Maximum Diameter (inches)
Booth 1	Spraybooth 1	62.0	28.0
Booth 2	Spraybooth 2	62.0	28.0
Booth 3	Spraybooth 3	62.0	28.0
Booth 4	Spraybooth 4	62.0	28.0
Oven 1	Infrared Oven 1	62.0	18.0
Oven 2	Infrared Oven 2	62.0	18.0
Oven 3	Infrared Oven 3	62.0	18.0
Oven 4	Infrared Oven 4	62.0	18.0
Oven 5	Infrared Oven 5	62.0	18.0

(R336.1901)