

SUPPLEMENT to PERMIT No. 444-99
Nakano Foods Inc
Belding, Michigan
October 5, 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 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

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.

Draft SPECIAL CONDITIONS
 December 1, 2000
 (9 Special Conditions)

This permit covers the following emission unit:

Emission Unit ID	Equipment
EUACETATORS	Eight acetators all controlled by a scrubber

1. The applicant shall not exceed the following pounds per hour and tons per year emission rates. The pounds per hour limit shall be calculated on a daily average basis. Daily average emission rates shall be calculated based upon monthly production records, prorated to a daily rate. Should the prorated daily average emission rate exceed 80% of the daily average limit, applicant shall commence daily production recordkeeping for a minimum of three months until the prorated rate falls below 80% of the daily average limit as calculated at the end of the month. The tons per year limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month. All records shall be kept on file for a period of at least five years and made available to the Department upon request.

Pollutant	Pounds per hour	Tons per year	Applicable
Volatile organic (VOC)	3.81	9.7	R336.1702(a)
Acetic acid	1.8	4.0	R336.1224, R336.1225
Acetaldehyde	0.28	0.56	R336.1224, R336.1225

2. The VOC emission rate from EUACETATORS shall not exceed 9.7 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month. [R336.1702(a)]
2. The acetic acid emission rate from EUACETATORS shall not exceed a daily average of 1.8 pounds per hour. Daily average acetic acid emission rates shall be calculated based upon monthly production records, prorated to a daily rate. Should the prorated daily average emission rate exceed 80% of the daily average limit, applicant shall commence daily production recordkeeping for a minimum of three months until the prorated rate falls below 80% of the daily average limit as calculated at the end of the month. All above described records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1224, R336.1225]
3. The acetic acid emission rate from EUACETATORS shall not exceed 4.0 tons per year based upon a 12-month rolling time period as determined at the end of each calendar month. [R336.1224, R336.1225]
3. The acetaldehyde emission rate from the EUACETATORS shall not exceed 0.28 pound per hour. nor 0.56 tons per year. The tons per year shall be based upon a 12-month

rolling time period as determined at the end of each calendar month. [R336.1224, R336.1225]

4. The applicant shall not operate the EUACETATORS unless the scrubber is installed and operating properly. [R336.1224, R336.1225, R336.1910]
5. The applicant shall equip and maintain the scrubber with a liquid flow meter approved by the District Supervisor. [R336.1224, R336.1225, R336.1910]
13. Applicant shall keep detailed records as described below. These records shall be kept on file for a period of at least five years and made available to the Department upon request.

	Records	Requirements
EUACETATORS	<ul style="list-style-type: none"> • The hours of operation on a monthly basis. • The hours of operation on a daily basis, as needed to comply with Special Condition 2. • The VOC emission rate in pounds per hour, based on a daily average as described in Special Condition 2. • Monthly and 12-month rolling time period VOC emission rates. • The formulation of each product, including VOC and toxic contents. • The volume of each product produced on a monthly basis. • Volume of each product produced per day as required by Special Condition 2. • The methods used to calculate these rates. 	R336.1205(3) R336.1225 R336.1702(a) R336.1901

6. Applicant shall calculate the actual VOC emission rates from the process for each calendar month. This information shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1225, R336.1702]
7. Applicant shall keep detailed records for the equipment required in the manufacturing process, the chemical steps performed to make each batch of product, the calculated emission rates in pounds per batch and pounds per hour of each pollutant, and the method of calculation. This information shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1225, R336.1702]
8. The exhaust gases from the EUACETATORS 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 55 feet above ground level. [R336.1225]
9. The applicant shall prepare and implement a PMP for the scrubber. A copy of the plan must be submitted to the District Supervisor of the Air Quality Division prior to the operation of the scrubber. [R336.1911]

Nakano Foods Inc.
Permit No. 444-99
Page No. 6
Draft, December 1, 2000