

SUPPLEMENT to PERMIT No. 137-00  
Actron Steel  
Traverse City, Michigan  
October 18, 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 Department's 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 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.
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  
October 18, 2000  
(7 Special Conditions)

1. The total volatile organic compound (VOC) emission rate from the spray booth used to coat metal parts, hereinafter known as EU-SPRAYBOOTH, shall not exceed 2,000 pounds per month, nor 10.0 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month. Note that total VOC includes all purge, wipe and cleanup solvents. (R 336.1225, R 336.1702 (a))
2. The applicant shall keep a record, acceptable to the District Supervisor, of the following information for EU-SPRAYBOOTH:
  - A. Monthly for each coating used:
    1. The amount in gallons of each coating applied.
    2. The VOC content in pounds per gallon of each coating (with water) as received and as applied.
    3. The VOC content in pounds per gallon of each reducer and each catalyst (with water), and the amount in gallons applied.
    4. The amount in gallons of each purge, wipe, and cleanup solvent used.
    5. The VOC content in pounds per gallon of each purge wipe and cleanup solvent used.
  - B. VOC emission calculations determining the mass VOC emissions for each calendar month in pounds per month and a 12-month rolling time period mass emission at the end of each calendar month in tons per year.

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. (R 336.1225, R 336.1702 (a))

3. The applicant shall not operate EU-SPRAYBOOTH unless all exhaust filters are in place and operating properly. (R 336.1225, R 336.1901, R 336.1910)
4. The applicant shall equip and maintain EU-SPRAYBOOTH with high volume low pressure (HVLP) spray guns or equivalent technology with comparable transfer efficiency, except that an airless spray gun may be used for application of not more than 1,800 gallons per year of primer. The applicant shall keep a record, acceptable to the District Supervisor, of the amount in gallons per month of coating applied using the airless gun. All applicators shall be properly installed, maintained and operated according to manufacturer's specifications. (R 336.702 (a))
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. (R 336.1702 (a))
6. All waste purge solvents and coatings from all coating applicators used for the 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.  
(R 336.1201)

7. The exhaust gases from EU-SPRAYBOOTH shall be discharged unobstructed vertically upwards to the ambient air from 2 stacks each with a maximum diameter of 30 inches and an exit point not less than 39 feet above ground level. (R 336.1225, R 336.1901, 40 CFR 52.21(c) and (d))