

SUPPLEMENT to PERMIT No. 165-00
Woodspecs, Inc.
Waterford, Michigan
September 6, 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.

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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
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 (10 Special Conditions)

The following table constitutes the equipment covered by this permit for Woodspecs, Inc.

Flexible Group ID	Emission Unit ID	Associated Equipment
FG-SPRAYBOOTHS (FG-SB)	EU-MAINLINE	Three-stage washer, one dry-off oven, seven plastic automotive parts spray booths, two bake ovens
	EU-IRLINE	Three plastic automotive parts spray booths, one infrared bake oven
	EU-COLORBOOTH	One spray booth
	EU-SPECIALTYBOOTH	One spray booth, one bake oven
	EU-BATCHBOOTH	One spray booth, one bake oven

1. The total volatile organic compound (VOC) emission rate from FG-SB shall not exceed 35.3 pounds per hour nor 29.0 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205, R 336.1225, and R 336.1702(d))**

2. 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 22.5 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. **(R 336.1205(3))**

3. The applicant shall keep a record, for each calendar month, of the following information for FG-SB:
 - a) Daily hours of operation.

 - b) Daily for each coating, reducer, and solvent used:
 1. The amount used in gallons (with water), and
 2. The VOC content in pounds per gallon (with water) as applied.

 - c) Monthly VOC emissions calculations, determining the total mass emissions from the emission unit in pounds per month and a 12-month rolling average mass emissions 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 District Supervisor upon request. **(R 336.1205, R 336.1225, and R 336.1702(d))**

4. The applicant shall keep a record, for each calendar month, of the following information for the stationary source:
 - a. Daily for each coating, reducer, and solvent used:
 1. The amount used in gallons of each material, and
 2. The HAP content, in pounds per gallon, of each material.
 - b) Individual and aggregate HAP emission calculations, determining the monthly emission rate in pounds per month and a 12-month rolling average mass HAP emissions 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 District Supervisor upon request. **(R 336.1205(3))**

5. The applicant shall not operate the spray booth portions of EU-MAINLINE, EU-IRLINE, EU-COLORBOOTH, EU-SPECIALTYBOOTH, and EU-BATCHBOOTH unless their respective exhaust filters are in place and operating properly. **(R 336.1205, R 336.1224, R 336.1301, and R 336.1910)**
6. The applicant shall equip and maintain the spray booth portions of EU-MAINLINE, EU-IRLINE, EU-SPECIALTYBOOTH, and EU-BATCHBOOTH with high volume low pressure (HVLP) spray guns or equivalent technology with comparable transfer efficiency. **(R 336.1205 and R 336.1702(a))**
7. 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 336.1225 and R 336.1702(d))**
8. The applicant shall maintain a current listing from the manufacturer, of the chemical composition of each coating, 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 and R 336.1702(a))**

9. The exhaust gases from EU-MAINLINE, EU-IRLINE, EU-COLORBOOTH, EU-SPECIALTYBOOTH, and EU-BATCHBOOTH 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 No.	Description	Maximum Diameter (inches)	Minimum Exit Point above Ground Level (feet)
SV00001	Three-stage washer	30	35
SV00002	Dry-off oven	16	35
SV00003	Spray Booth Exhaust (SB-M1)	30	35
SV00004	Spray Booth Exhaust (SB-M2)	30	35
SV00005	Spray Booth Exhaust (SB-M3)	30	35
SV00006	Spray Booth Exhaust (SB-M4)	30	35
SV00007	Bake Oven Exhaust	10	35
SV00008	Spray Booth Exhaust (SB-M5)	30	35
SV00009	Spray Booth Exhaust (SB-M6)	30	35
SV00010	Spray Booth Exhaust (SB-M7)	30	35
SV00011	Bake Oven Exhaust	10	35
SV00012	Spray Booth Exhaust (SB-IR1)	30	35
SV00013	Spray Booth Exhaust (SB-IR2)	30	35
SV00014	Spray Booth Exhaust (SB-IR3)	30	35
SV00015	Infrared Bake Oven Exhaust	10	35
SV00016	Color Coordination Spray Booth Exhaust	30	35
SV00017	Specialty Color Spray Booth Exhaust	30	35
SV00018	Bake Oven Exhaust	10	35
SV00019	Batch Spray Booth Exhaust	18	35
SV00020	Batch Spray Booth Exhaust	18	35

10. The disposal of waste coatings, solvents, and exhaust filters shall be performed in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1225, R 336.1702(a), and R 336.1901)**