

**NEW SOURCE REVIEW PERMIT TO INSTALL**

**Table of Contents**

<b>Section</b>	<b>Page</b>
Alphabetical Listing of Common Abbreviations / Acronyms .....	2
General Conditions .....	3
Emission Unit Identification.....	5
Flexible Group Identification .....	5
Flexible Group Special Conditions .....	6

**Common Abbreviations / Acronyms Used in this Permit to Install**

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
ANSI	American National Standards Institute	°C	Degrees Celsius
BACT	Best Available Control Technology	CO	Carbon Monoxide
CAA	Clean Air Act	dscf	Dry standard cubic foot
CEM	Continuous Emission Monitoring	dscm	Dry standard cubic meter
CFR	Code of Federal Regulations	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
GACS	Gallon of Applied Coating Solids	H <sub>2</sub> S	Hydrogen Sulfide
GC	General Condition	HP	Horsepower
HAP	Hazardous Air Pollutant	lb	Pound
HVLP	High Volume Low Pressure *	m	Meter
ID	Identification	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	NO <sub>x</sub>	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality	PM	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM-10	Particulate Matter less than 10 microns diameter
MSDS	Material Safety Data Sheet	pph	Pound per hour
NESHAP	National Emission Standard for Hazardous Air Pollutants	ppm	Parts per million
NSPS	New Source Performance Standards	ppmv	Parts per million by volume
NSR	New Source Review	ppmw	Parts per million by weight
PS	Performance Specification	psia	Pounds per square inch absolute
PSD	Prevention of Significant Deterioration	psig	Pounds per square inch gauge
PTE	Permanent Total Enclosure	scf	Standard cubic feet
PTI	Permit to Install	sec	Seconds
RACT	Reasonable Available Control Technology	SO <sub>2</sub>	Sulfur Dioxide
SC	Special Condition	THC	Total Hydrocarbons
SCR	Selective Catalytic Reduction	tpy	Tons per year
SRN	State Registration Number	µg	Microgram
TAC	Toxic Air Contaminant	VOC	Volatile Organic Compounds
VE	Visible Emissions	yr	Year

\* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

### 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. **[R336.1201(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, PO 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. **[R336.1201(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 R336.1210, 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. **[R336.1201(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. **[R336.1201(8), Section 5510 of Act 451, PA 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 R336.1219 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 R336.1219. The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **[R336.1219]**
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. **[R336.1901]**
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. **[R336.1912]**
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 or 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 R336.1301, 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 R336.1303. **[R336.1301]**
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent 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 R336.1370(2). **[R336.1370]**
13. Except as allowed by Rule 285 (a), (b), and (c), permittee 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. **[R336.1201(1)]**
14. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R336.2001 and R336.2003, under any of the conditions listed in R336.2001. **[R336.2001]**

**SPECIAL CONDITIONS**

**Emission Unit Identification**

<b>Emission Unit ID</b>	<b>Emission Unit Description</b>	<b>Stack Identification</b>
EUDRYER1	Natural Rubber and Neoprene Rubber washer and natural gas fired dryer oven for drying of leached neoprene and rubber parts.	SVDRYER1
EUDRYER2	Conveyorized natural gas fired curing oven for neoprene parts.	SVDRYER2
EUDIPCOAT1	Batch dip-coat process for preheating, PVC dip coating and curing in natural gas fired oven.	SVDIPCOAT3
EUDIPCOAT2	Batch dip-coat process for wet Neoprene suspension, dip coating and curing in natural gas fired oven (EUYER2).	SVDRYER2
EUDIPCOAT3	Batch dip-coat process for preheating, PVC dip coating and curing in natural gas fired oven.	SVDIPCOAT4
EUDIPCOAT4	Two conveyorized Clip coating lines for preheating, dip-coating and curing of stamping parts. Electrically heated oven.	SVDIPCOAT5
EUCOLDCLEANER	Cold Cleaner for part stripping consisting of three 5-gallon buckets containing 2.0 gallon Trichloroethylene (CAS # 79-01-6) in each bucket.	N/A
EUDIPCOAT5	One conveyor ized Clip coating line for preheating, PVC dip-coating and baking of Clip parts. The preheat and curing oven is natural gas fired	SVDIPCOAT7A, SVDIPCOAT7B, SVDIPCOAT7C, SVDIPCOAT7D,
EUPRIMECOAT	A primer coating station with a general room exhaust	SVPRIMECOAT8
EUDDIPCOAT6	Three conveyer ized Clip coating lines for preheating, PVC dip-coating and baking of Clip parts. The preheat and curing oven is natural gas fired	SVDIPCOAT9, SVDIPCOAT10, SVDIPCOAT11,
EUCLEANUP	Any clean-up and purge solvents used in the processes.	NA
Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 to R336.1290.		

**Flexible Group Identification**

<b>Flexible Group ID</b>	<b>Emission Units Included in Flexible Group</b>	<b>Stack Identification</b>
FGCOATING	EUDIPCOAT1, EUDIPCOAT2, EUDIPCOAT3, EUDIPCOAT4, EUSTRIP, EUDIPCOAT5, EUDIPCOAT6, EUPRIMECOAT, EUDRYER1, EUDRYER2, and EUCLEANUP	SVDIPCOAT3, SVDIPCOAT4, SVDIPCOAT5, SVSTRIP6C, SVDIPCOAT7A, SVDIPCOAT7B, SVDIPCOAT7C, SVDIPCOAT7D, SVPRIMECOAT8, SVDIPCOAT9 SVDIPCOAT10, SVDIPCOAT11, SVDRYER1, & SVDRYER2

<b>Flexible Group ID</b>	<b>Emission Units Included in Flexible Group</b>	<b>Stack Identification</b>
FGFACILITY	All equipment at the facility including equipment covered by other permits, grand-fathered equipment and exempt equipment.	All stacks.

**The following conditions apply to: EUCOLDCLEANER**

**Emission Limits**

	<b>Pollutant</b>	<b>Equipment</b>	<b>Limit</b>	<b>Time Period</b>	<b>Testing/ Monitoring Method</b>	<b>Applicable Requirements</b>
1.1	Trichloroethylene	EUCOLDCLEANER	0.31 tpy	12-month rolling time period as determined at the end of each calendar month.	SC 1.10	R336.1225

**Material Usage Limits**

1.2 The permittee shall not use more than 50 gallons of Trichloroethylene, hereinafter "solvent", per year based on a 12-month rolling period as determined at the end of each calendar month. The amount of solvent used shall be determined on a "net usage" basis. "Net usage" is defined as the amount of solvent added to EUCOLDCLEANER to bring the solvent levels up to starting levels less any amount of solvent removed as waste. **[R336.1702(a), 40 CFR Part 63 Subpart T]**

**Process/Operational Limits**

- 1.3 The permittee shall not operate EUCOLDCLEANER except in compliance with the control requirements of 40 CFR 63.462 (a)(1) and (a)(2) **[40 CFR Part 63 Subpart T]**
- 1.4 The permittee shall not operate EUCOLDCLEANER except in compliance with the design requirements of 40 CFR 63.462(c)(1) through (c)(8). **[R336.1702(a), 40 CFR Part 63 Subpart T]**
- 1.5 The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and T, as they apply to EUCOLDCLEANER. **[40 CFR Part 63 Subpart T]**

**Monitoring**

1.6 The permittee shall not operate EUCOLDCLEANER except in compliance with the monitoring requirements of 40 CFR 63.466. **[R336.1702(a), 40 CFR Part 63 Subpart T]**

**Recordkeeping/Reporting/Notification**

- 1.7 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the amount of solvent used each month and 12-month rolling time period. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1225]**
- 1.8 The permittee shall keep records for EUCOLDCLEANER as specified in 40 CFR 63.467. All records shall be kept on file for a period of at least five years, unless otherwise specified, and made available to the Department upon request. **[40 CFR Part 63 Subpart T]**

1.9 The permittee shall submit reports to the AQD District Supervisor as specified in 40 CFR 63.468.  
**[40 CFR Part 63 Subpart T]**

1.10 The permittee shall keep the following information on a monthly basis for EUCOLDCLEANER:

- a) Gallons of solvent used/added per month.
- b) Gallons of solvent sent for reclamation per month.
- c) Solvent mass emission calculations determining the monthly emission rate in pounds per calendar month.
- d) Solvent mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records are for the purpose of compliance demonstration and shall be kept in a format acceptable to the AQD Supervisor. All records 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, R336.1901]**

**The following conditions apply to: FGCOATING**

**Emission Limits**

	<b>Pollutant</b>	<b>Equipment</b>	<b>Limit</b>	<b>Time Period</b>	<b>Compliance Method</b>	<b>Applicable Requirements</b>
2.1a	VOCs	FGCOATING	24 tpy	12-month rolling time period as determined at the end of each calendar month	SC 2.8 & SC 2.9	R336.1702(a)
2.1b	Betachloroprene	FGCOATING	33.6 lbs. per year	12-month rolling time period as determined at the end of each calendar month	SC 2.10	R336.1225, R336.1901

**Material Limits**

Permittee shall not process neoprene parts and/or use the following coatings, in excess of their corresponding annual quantities in pounds or gallons, in the FGCOATING, on an as applied and/or as used basis, based upon a 12-month rolling time period: **(R336. 1225, R336. 1702(a), and R336. 1901).**

	<b>Coating and /or Process Description</b>	<b>Annual Gallons or Pounds Used or Number of Parts Processed</b>	<b>Compliance Method</b>
2.2a	Dry leached Neoprene Parts processed in EUDRYER1 and/or EUDRYER2	The number of parts processed in FGDRYER shall not exceed the number of parts produced by using <b>100,000</b> 12-month rolling time period as determined at the end of each calendar month, of wet Neoprene suspension.	SC 2.10f
2.2b	Neoprene coated metal stamping parts dip coated and cured in EUDIPCOAT2.	Usage of Neoprene coating, in the process, shall not exceed 12,000 pounds of wet Neoprene suspension per 12-month rolling time period as determined at the end of each calendar month.	SC2.10g

	<b>Coating and /or Process Description</b>	<b>Annual Gallons or Pounds Used or Number of Parts Processed</b>	<b>Compliance Method</b>
2.2c	PVC Dip (Tank/s) and Preheat/Cure oven EUDIPCOAT1	Usage of PVC coating in the process shall not exceed 1,500 pounds per 12-month rolling time period as determined at the end of each calendar month.	SC2.10g
2.2d	PVC Dip (Tank/s) and Preheat/Cure oven EUDIPCOAT3	Usage of PVC coating in the process shall not exceed 5,000 pounds per 12-month rolling time period as determined at the end of each calendar month.	SC2.10g
2.2e	EUDIPCOAT5	Usage of PVC coating shall not exceed 60,000 pounds per 12-month rolling time period as determined at the end of each calendar month.	SC2.10g
2.2f	EUDIPCOAT6	Usage of PVC coating shall not exceed 30,000 pounds per 12-month rolling time period as determined at the end of each calendar month.	SC2.10g
2.2g	EUPRIMECOAT	Usage of Primer coating shall not exceed 2000 pounds per 12-month rolling time period as determined at the end of each calendar month.	SC2.10g

**Process / Operational Limits**

- 2.3 All waste coatings, dry leach waste solids and liquids shall be captured and stored in closed containers and shall be disposed of in an acceptable manner in compliance with all applicable rules and regulations. **[R336.1702(a)]**
- 2.4 The disposal of spent and/or waste materials shall be performed in a manner which minimizes the introduction of air contaminants to the outer air. **[ R336.1370]**

**Equipment**

- 2.5 The permittee shall equip and maintain the EUPRIMECOAT with HVLP or equivalent technology with comparable transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **[R336.1702(a) ]**

**Testing**

- 2.6 The VOC content, water content, and density of any coating, as applied and as received, shall be determined using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the VOC content may be determined from manufacturer’s formulation data. If the Method 24 and the formulation values should differ, the Method 24 results shall be used to determine compliance. **[R336.1225, R336.1702, R336.1901]**

**Recordkeeping /Reporting /Notification**

- 2.7 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer’s formulation data, or both. All records are for the purpose of compliance

demonstration and 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, R336.1901]**

2.8 The permittee shall keep the following information on a monthly basis for FGCOATING:

- a) Gallons (with water) of each coating used.
- b) VOC content (minus water and with water) of each coating as applied.
- c) VOC emission calculations determining the volume-weighted average VOC content of the coating as applied on a monthly basis.
- d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
- e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
- f) Hours of operation.
- g) Monthly and yearly usage of Neoprene suspension in pounds per month and tons per 12 month rolling time period as determined at the end of each calendar month to produce the semi cured parts processed in EUDRYER1 and EUDRYER2

The records are for the purpose of compliance demonstration and shall be kept in a format acceptable to the AQD Supervisor. All records 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, R336.1901]**

2.9 The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with FGCOATING:

- a) Gallons of each solvent used and reclaimed.
- b) VOC content, in pounds per gallon, of each solvent used.
- c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
- d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records are for the purpose of compliance demonstration and shall be kept in a format acceptable to the AQD Supervisor. All records 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, R336.1901]**

2.10 The permittee shall keep the following information on a monthly basis for FGCOATING:

- a) Gallons (with water) of each betachloroprene containing material used.
- b) Where applicable, gallons (with water) of each betachloroprene containing material reclaimed.

- c) The betachloroprene content (with water) in pounds per gallon of each material used.
- d) Betachloroprene mass emission calculations determining the monthly emission rate in pounds per calendar month.
- e) Betachloroprene mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.
- f) Monthly and yearly throughput of the number of semi-cured parts in EUDRYER1 and EUDRYER2 and calculations determining the corresponding pounds of wet neoprene suspension required for producing the said quantity of parts at the end of each calendar month.
- g) Monthly and yearly usage rates in pounds per month and pounds per 12-month rolling time period as determined at the end of each calendar month for all materials used.

The records are for the purpose of compliance demonstration and shall be kept in a format acceptable to the AQD Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1225, R336.1901]

**Stack / Vent Restrictions**

	<b>Stack &amp; Vent ID</b>	<b>Maximum Diameter (inches)</b>	<b>Minimum Height Above Ground Level (feet)</b>	<b>Applicable Requirement</b>
2.11a	SVDRYER1	8	8	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11b	SVDRYER2	8	22	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11c	SVDIPCOAT3	6	17	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11d	SVDIPCOAT4	8	21	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11e	SVDIPCOAT4A	6	21	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11f	SVDIPCOAT5	12	17	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11g	SVSTRIP6C	21	8	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11h	SVDIPCOAT7A	15	24	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11i	SVDIPCOAT7B	18	24	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11j	SVDIPCOAT7C	7	24	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11k	SVDIPCOAT7D	12	26	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11l	SVDIPCOAT9	10	18	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
2.11m	SVDIPCOAT10	10	18	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)

	<b>Stack &amp; Vent ID</b>	<b>Maximum Diameter (inches)</b>	<b>Minimum Height Above Ground Level (feet)</b>	<b>Applicable Requirement</b>
2.11n	SVDIPCOAT11	10	18	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)

**The following conditions apply to: FGFACILITY**

**Emission Limits**

	<b>Pollutant</b>	<b>Equipment</b>	<b>Limit</b>	<b>Time Period</b>	<b>Compliance Method</b>	<b>Applicable Requirements</b>
3.1a	EACH INDIVIDUAL HAP	FGFACILITY	Less than 9.0 tons per year	12-month rolling time period as determined at the end of each calendar month	SC 3.4	R336.1205(3)
3.1b	Aggregate HAPs	FGFACILITY	Less than 22.5 tons per year	12-month rolling time period as determined at the end of each calendar month	SC 3.4	R336.1205(3)

**Testing**

3.2 The HAP content of any degreaser solvent coating, molding material, thinners, primers, sealers, and any other spray/flow coating, hereinafter "material" as received and as applied, shall be determined using manufacturer's formulation data. Upon request of the AQD District Supervisor, the manufacturer's HAP formulation data shall be verified using EPA Test Method 311. **[R336.1205(3)]**

**Recordkeeping / Reporting / Notification**

3.3 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each degreaser solvent. coating, molding material, thinners, primers, sealers, and any other spray/flow coating, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both. All records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1205(3)]**

3.4 The permittee shall keep the following information on a monthly basis for FGFACILITY:

- a) Gallons or pounds of each material used.
- b) Where applicable, gallons or pounds of each material reclaimed.
- c) HAP content, in pounds per gallon or pounds per pound, of each material used.
- d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The records are for the purpose of compliance demonstration and shall be kept in a format acceptable to the AQD Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1205(3)]**