

SUPPLEMENT TO PERMIT NO. 48-00

Cadillac Products Automotive Company  
Rogers City, Michigan

July 24, 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 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 Rule 336.2001 and Rule 336.2003, under any of the conditions listed in Rule 336.2001.

SPECIAL CONDITIONS  
 July 24, 2000  
 (13 Special Conditions)

1. The processes covered by this permit are defined hereinafter as the Flexible Groups (FG) and Emission Units (EU), listed in the following Table 1. (R 336.1201)

**Table 1: Flexible Group, Emission Unit, and Stack Data**

Flexible Group (FG)		Emission Unit (EU)		Stack (STK)		
ID	Description	ID	Description	ID	Maximum Diameter (inches)	Minimum Height (feet)
FGFLEXOGRAPIC	Two flexographic printing presses used in the manufacture of plastic—low density polyethylene film automotive component	EU00001	Flexographic Printing Press No. 1 (Press #242)	SV00004	40	30
		EU00002	Flexographic Printing Press No. 2 (Press #276)			
NA	NA	EUCLEANUP	Total Source Wide Combined Clean UP and Purge Solvents	NA	NA	NA

2. The total combined Volatile Organic Compounds (VOC) emission rate from FGFLEXOGRAPIC shall not exceed 8.3 pounds per hour based upon an operational day average, nor 33.3 tons per year based upon a 12-month rolling time period averages determined at the end of each calendar month. (R 336.1205, R336.1225, R 336.1702(a))
3. The VOC emission rate from the EUCLEANUP shall not exceed 5.0 tons per year based upon a 12-month rolling time period averages determined at the end of each calendar month. (R 336.1205, R336.1225, R 336.1702(a))
4. The hazardous air pollutants (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 (all permitted sources, all exempted sources, and all grandfathered sources). These annual limits shall be based upon a 12-month rolling time period as determined at the end of each calendar month. (R 336.1205(3))
5. Within 180 days after commencement of trial operation, verification of VOC emission rates from FGFLEXOGRAPHIC and the capture efficiency and destruction efficiency of the Regenerative Thermal Oxidizer (RTO) control system by testing, at owner's expense, in accordance with Department requirements, will be required. Verification of emission rates includes the submittal of a complete report of the test results. No less than 60 days prior to testing complete test plan must be submitted to the Air Quality Division. The final plan must be approved by the Division prior to testing and a complete report of test results must be submitted to the Division within 60 days following the last date of testing. (R 336.11001, R 336.11002, R 336.11003)

6. The permittee shall not operate the FGFLEXOGRAPIC unless the RTO control system is installed and operated properly. Proper operation of the RTO control system includes a minimum VOC destruction efficiency of 95 percent (by weight), maintaining a minimum temperature of 1,400°F, a minimum retention time of 0.5 seconds, and a capture efficiency of 80 percent. (R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)
7. The permittee shall monitor and record the temperature in the RTO on a continuous basis in a manner and with instrumentation and at a location acceptable to the District Office, Air Quality Division. 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. (R 336.1205, R 336.1225, R 336.1702(a), R 336.1901, R 336.1910)
8. Applicant shall keep a separate record for each of the following:
  - a) Calendar day record of each material (ink, adhesive, varnish, coating, cleanup solvent, thinning, etc.) used in the FGFLEXOGRAPIC:
    - i) The identification and category for each product.
    - ii) The VOC content in pounds per pounds (minus water) or weight percent as received and as applied for each product.
    - iii) The HAP content, for each individual HAP, in pounds per gallon or weight percent as received and as applied for each product.
    - iv) The amount in gallons or pounds of each product used.
    - v) Actual hours of operation.
  - b) Monthly record of each material used in the EUCLEANUP:
    - i) The identification and category for each product.
    - ii) The VOC content in pounds per gallon (minus water) or weight percent as received and as applied for each product.
    - iii) The HAP content, for each individual HAP, in pounds per gallon or weight percent for each product.
    - iv) The amount in gallons or pounds of each product used.
    - v) The amount in gallons or pounds of each product reclaimed.
  - c) Monthly VOC emission calculations determining a 12-month rolling time period emission rate in tons per year.
  - d) Daily VOC emission calculations, determining emission rate in pounds per operational day.
  - e) Monthly HAP emission calculations for stationary source, determining the 12-month rolling time period emissions rate for each individual HAP and total aggregate HAPs 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 336.1205, R336.1225, R 336.1702(a))

9. The VOC content, water content, density, solids weight fraction and solids volume fraction of any ink or coating as applied and as received shall be determined using federal Reference Test Method 24 (coatings only) or Method 24A (inks or coatings). Upon prior approval of the District Supervisor, Air Quality Division, VOC content of any material used in the printing process may alternatively be determined from manufacturer's formulation data. (R 336.1702(a), R 336.1901, R 336.2001, R 336.2002, R 336.2003, R 336.2040)
10. All waste material shall be captured and stored in closed containers and be disposed of in an acceptance manner in compliance with all applicable rules and regulations. (R 336.1205, R336.1225, R 336.1702(a))
11. The permittee shall maintain a current listing of the chemical composition of each material, including the weight percentage of each component. The data may consist of material safety data sheets, manufacturer's formulation data, or both. The 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. (R 336.1205, R336.1225, R 336.1702(a))
12. The exhaust gases from this stationary source shall be discharged unobstructed vertically upwards to the ambient air from stack with dimensions listed in the Table 1, as specified in the Special Condition No. 1. (R 336.1225, R 336.1901, 40 CFR 52.21 Part (c) & (d))
13. Within 60 calendar days of issuance of this permit, the permittee shall label each flexible group and emission unit according to a method acceptable to the District Supervisor. Within 10 calendar days of completing the labeling, the permittee shall notify the District Supervisor, in writing, as to the date the labeling was completed. (R 336.1201)