

SUPPLEMENT to PERMIT No. 211-01
Freedom Finishing, Inc.
Benton Harbor, Michigan
August 7, 2001

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. [R 336.1201(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. [R 336.1201(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 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. [R 336.1201(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. [R 336.1201(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 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. [R 336.1219]
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. [R 336.1901]
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. [R 336.1912]
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 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. [R 336.1301]
 - 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 R 336.1370(2). [R 336.1370]
 13. 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. [R 336.1201(1)]
 14. 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. [R 336.2001]

SPECIAL CONDITIONS
 August 7, 2001

Emission Unit Identification

Emission Unit	Equipment Description	Stack Identification	Reference Number
EU-ECOATLINE	EU-ECOATLINE is an electro-deposition line used for coating metal parts. The line consists of a 12 stage phosphating and e-coat process followed by a drying oven and a curing oven. Heat for the phosphating stages is provided by a 1.6 MBTU gas fired boiler.	SV-ECOATOVEN, SV-ECOATBOILER, SV-ECOAT	1

EU-ECOATLINE

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Compliance Method	Applicable Requirements
1.1	VOCs	EU-ECOATLINE	1,800 pounds	per month	Special Condition Nos. 1.5 & 1.6	R336.1225, R336.1702(a) & R336.1901
1.2	VOCs	EU-ECOATLINE	5.0 tons	per 12 month rolling time period	Special Condition Nos. 1.5 & 1.6	R336.1702(a) & R336.1901

Process/Operational Limit

- 1.3 All waste coatings and solvents 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. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702(a) & R 336.1901)**

Testing

- 1.4 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 336.1205, R 336.1224, R 336.1225, R 336.1702(a), & R 336.1901)**

Recordkeeping/Reporting/Notification

- 1.5 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, catalyst, reducer, cleanup solvent, etc., including the weight percentage of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both. **(R 336.1225, R 336.1702(a), & R 336.1901)**
- 1.6 The permittee shall keep the following information on a monthly basis for the EU-ECOATLINE:
 - A. Gallons (with water) of each coating, reducing solvent and clean-up solvent used.
 - B. The as-received VOC content (with water) of each coating, reducing solvent and clean-up solvent used.
 - C. VOC mass emission calculations determining the monthly emission rate in tons per month.
 - D. VOC mass emission calculations determining the yearly 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 that has been approved by the Air Quality Division District Supervisor. All records shall be kept on file for a period of at least five years and be made available to the Department upon request. **(R336.1205, R336.1224, R336.1225, R336.1702(a), & R336.1901)**

Stacks/Vents Restrictions

EU-ECOATLINE

	Process Equipment	Stack ID	Minimum Stack Height (feet)	Maximum Stack Dimensions (inches)	Applicable Requirements
1.7	EU-ECOATLINE	SV-ECOATOVEN	34	18 diameter	R336.1225, R336.1901, 40 CFR 52.21 Subparts (c) & (d)
1.8	EU-ECOATLINE	SV-ECOATBOILER	36	18 diameter	R336.1225, R336.1901, 40 CFR 52.21 Subparts (c) & (d)
1.9	EU-ECOATLINE	SV-ECOAT	37	33 x 33	R336.1225, R336.1901, 40 CFR 52.21 Subparts (c) & (d)
Exhaust gases from these stacks shall be discharged unobstructed vertically upwards to the ambient air.					