

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

November 22, 2002

**PERMIT TO INSTALL**

No. 180-02

**ISSUED TO**

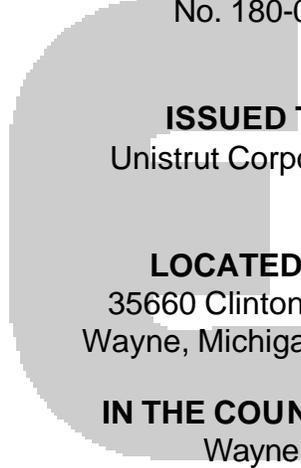
Unistrut Corporation

**LOCATED AT**

35660 Clinton Street  
Wayne, Michigan 48184

**IN THE COUNTY OF**

Wayne



**STATE REGISTRATION NUMBER**

A8019

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: <b>11/04/2002</b>	
DATE PERMIT TO INSTALL APPROVED: <b>11/22/2002</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

**NEW SOURCE REVIEW PERMIT TO INSTALL**

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

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
EPA	Environmental Protection Agency	gr	Grains
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	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
MSDS	Material Safety Data Sheet	PM-10	Particulate Matter less than 10 microns diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	pph	Pound per hour
NSPS	New Source Performance Standards	ppm	Parts per million
NSR	New Source Review	ppmv	Parts per million by volume
PS	Performance Specification	ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge
PTI	Permit to Install	scf	Standard cubic feet
RACT	Reasonable Available Control Technology	sec	Seconds
SC	Special Condition	SO <sub>2</sub>	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
VE	Visible Emissions	VOC	Volatile Organic Compounds
		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, 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, construction, reconstruction, relocation, or modification 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 permittee 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, construction, reconstruction, relocation, or modification 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 permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. 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 Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **[R336.1912]**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended 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 1994 PA Act 451, as amended 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, the permittee 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), the 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>	<b>Reference No.</b>
EUBLU-SURF-OVENS	Two (2) paint burn-off ovens. (Both located in building 21.)	SV-Blu-Surf-01 SV-Blu-Surf-02	1
EU-HEATTREAT	Heat treat furnace with oil quenching.	SV-HTFURNACE-1 SV-HTFURNACE-2	2
EU-ZNPLATING	Plating bath process for small metal parts controlled by a wet scrubber.	SV-scrbr-stack	3
EU-SKINNYDIPPER	Parts preparation, electrocoat dip tank, and two (2) bake ovens.	SV0007 SV0008 SV-Bakeoven-1-f SV-Bakeoven-2-f	4
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>	<b>Reference No.</b>
FG-FACILITY	All equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.	N.A.	5

**The following conditions apply to: EUBLU-SURF-OVENS**

**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	PM	Each oven in EUBLU-SURF-OVENS	0.1 lbs per 1,000 lbs of exhaust gas, corrected to 50% excess air*	Test Protocol	GC 14	R336.1224, R336.1331, 40 CFR 52.21 Subparts (c) & (d)
* Calculated on a dry gas basis.						

**Process / Operational Limits**

1.2 The permittee shall not process in EUBLU-SURF-OVENS any material other than cured paint on metal parts. **[R336.1225]**

**Equipment**

1.3 The permittee shall not operate EUBLU-SURF-OVENS unless a minimum temperature of 1400 °F and a minimum retention time of 0.5 seconds are maintained in the respective afterburners. **[R336.1225, R336.1301, R336.1331, R336.1702(a), R336.1910]**

**Monitoring**

1.4 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature near the combustion chamber outlet for each oven afterburner in EUBLU-SURF-OVENS on a continuous basis. All temperature data shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1225, R336.1301, R336.1331, R336.1702(a), R336.1910]**

**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>
1.5a	SV-Blu-Surf-01	12	34	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
1.5b	SV-Blu-Surf-02	12	35	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

**The following conditions apply to: EU-HEATTREAT**

**Emission Limits**

	<b>Pollutant</b>	<b>Equipment</b>	<b>Limit</b>	<b>Time Period</b>	<b>Testing/ Monitoring Method</b>	<b>Applicable Requirements</b>
2.1	PM	EU- HEATTREAT	0.1 lbs per 1,000 lbs of exhaust gas, corrected to 50% excess air*	Test Protocol	GC 14	R336.1331, R336.1901
* Calculated on a dry gas basis.						

**The following conditions apply to: EU-ZNPLATING**

**Equipment**

3.1 The permittee shall equip and maintain the scrubber portion of EU-ZNPLATING with a liquid flow meter. [R336.1901, R336.1910]

**Recordkeeping /Reporting /Notification**

3.2 The permittee shall record at least once per calendar day and keep, in a satisfactory manner, records of whether or not flow is within manufacturer's specifications and record any corrective action taken to return flow to manufacturer's specifications for the scrubber portion of EU-ZNPLATING. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1901, R336.1910]

**Permit Dates**

3.3 Within 30 days of issuance of this permit, the permittee shall install a liquid flow meter on the scrubber portion of EU-ZNPLATING. Within seven days of completing the installation, the permittee shall notify the AQD District Supervisor, in writing, as to the date the installation was completed. [R336.1901, R336.1910]

**The following conditions apply to: EU-SKINNYDIPPER**

**Emission Limits**

	<b>Pollutant</b>	<b>Equipment</b>	<b>Limit</b>	<b>Time Period</b>	<b>Testing/ Monitoring Method</b>	<b>Applicable Requirements</b>
4.1	VOCs	EU- SKINNYDIPPER	3.0 lb/gal (minus water) as applied	Daily volume- weighted average	SC 4.4	R336.1621

**Testing**

4.2 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. **[R336.1901]**

**Recordkeeping /Reporting /Notification**

- 4.3 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 shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1901]**
- 4.4 The permittee shall keep the following information on a daily basis for EU-SKINNYDIPPER:
- a) Gallons (minus water) of each coating used.
  - b) VOC content (minus water) of each coating as applied.
  - c) VOC emission calculations determining the volume-weighted average VOC content of the coating as applied on a daily basis.

The records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1621, R336.1901]**

**The following conditions apply to: FG-FACILITY**

**Emission Limits**

	<b>Pollutant</b>	<b>Equipment</b>	<b>Limit</b>	<b>Time Period</b>	<b>Testing/ Monitoring Method</b>	<b>Applicable Requirements</b>
5.1a	Each Individual HAP	FG-FACILITY	Less than 9.0 tons per year	12-month rolling time period as determined at the end of each calendar month	SC 5.4	R336.1205(3)
5.1b	Aggregate HAPs	FG-FACILITY	Less than 22.5 tons per year	12-month rolling time period as determined at the end of each calendar month	SC 5.4	R336.1205(3)
5.1c	VOCs	FG-FACILITY	Less than 90.0 tons per year	12-month rolling time period as determined at the end of each calendar month	SC 5.5	R336.1205(3)

**Testing**

5.2 The HAP content of any 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**

5.3 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both. 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)]**

5.4 The permittee shall keep the following information on a monthly basis for FG-FACILITY:

- 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 shall be kept in a format acceptable to the AQD District 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)]**

5.5 The permittee shall keep the following information on a monthly basis for FG-FACILITY:

- a) Gallons or pounds of each material used.

- b) Where applicable, gallons or pounds of each material reclaimed.
- c) VOC content, in pounds per gallon or pounds per pound, of each material used.
- d) VOC emission calculations determining the monthly emission rate of each in tons per calendar month.
- e) VOC 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 shall be kept in a format acceptable to the AQD District 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)]**