

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

March 6, 2006

**PERMIT TO INSTALL**

19-06

**ISSUED TO**

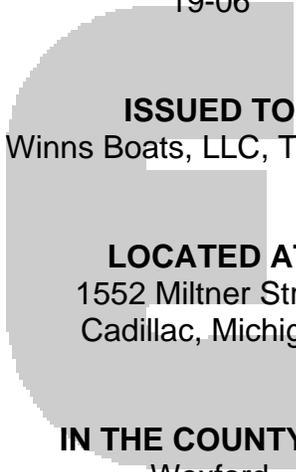
Four Winns Boats, LLC, Trailer Division

**LOCATED AT**

1552 Miltner Street  
Cadillac, Michigan

**IN THE COUNTY OF**

Wexford



**STATE REGISTRATION NUMBER**

N1772

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>January 24, 2006</b>	
DATE PERMIT TO INSTALL APPROVED: <b>March 6, 2006</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

**PERMIT TO INSTALL**

**Table of Contents**

<b>Section</b>	<b>Page</b>
Alphabetical Listing of Common Abbreviations / Acronyms .....	2
General Conditions .....	3
Special Conditions .....	5
Emission Unit Identification .....	5
Flexible Group Identification.....	5
Flexible Group Special Conditions .....	6
Flexible Group Special Conditions .....	9

**Common Abbreviations / Acronyms**

<b>Common Acronyms</b>		<b>Pollutant/Measurement Abbreviations</b>	
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
FG	Flexible Group	H <sub>2</sub> S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
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	Reasonably Available Control Technology	SO <sub>2</sub>	Sulfur Dioxide
ROP	Renewable Operating Permit	THC	Total Hydrocarbons
SC	Special Condition Number	tpy	Tons per year
SCR	Selective Catalytic Reduction	µg	Microgram
SRN	State Registration Number	VOC	Volatile Organic Compounds
TAC	Toxic Air Contaminant	yr	Year
TEQ	Toxicity Equivalence Quotient		
VE	Visible Emissions		

\* 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, P.O. 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 AQD District Supervisor shall be notified, in writing, of a change in ownership or operational control of the stationary source or emission unit(s) authorized by this Permit to Install pursuant to R336.1219. The notification shall include all of the information required by R336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R336.1219(1)(c), agreeing to and accepting the terms and conditions of this Permit to Install, and shall notify the AQD District Supervisor of any change in the contact person for this Permit to Install. **[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 nor does it affect any liability for past violations under the Natural Resources and Environmental Protection Act, 1994 PA 451.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 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. 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>
EU001	Trailer Paint Booth 1	SV001A
EU002	Trailer Paint Booth 2	SV002A
EU003	Trailer Paint Booth Oven 1	SV001B
EU004	Trailer Paint Booth Oven 2	SV002B
EU005	Solvent Clean-up Operations	SV001A, SV002A

**Flexible Group Identification**

<b>Flexible Group ID</b>	<b>Emission Units Included in Flexible Group</b>	<b>Stack Identification</b>
FG1	EU001, EU002, EU003, EU004, EU005	SV001A SV002A SV001B SV002B
FGFACILITY	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.	NA

**The following conditions apply to: FG1**

**Emission Limits**

	<b>Pollutant</b>	<b>Equipment</b>	<b>Limit</b>	<b>Time Period</b>	<b>Testing/ Monitoring Method</b>	<b>Applicable Requirements</b>
1.1a	VOCs	Primer and Topcoat Applications (combined) associated with FG1	30.0 tpy	12-month rolling time period as determined at the end of each calendar month	SC 1.9	R336.1702(a)
1.1b	VOC & Acetone combined	EU005 (cleanup solvent) portion of FG1	12.0 tpy	12-month rolling time period as determined at the end of each calendar month	SC 1.10	R336.1224, R336.1225, R336.1702(a)

**Material Limits**

	<b>Pollutant</b>	<b>Equipment</b>	<b>Limit</b>	<b>Time Period</b>	<b>Testing/ Monitoring Method</b>	<b>Applicable Requirements</b>
1.2a	VOCs	Primer coatings used in FG1	2.8 lb/gal (minus water)* as applied	Instantaneous	SC 1.6	R336.1702(c)
1.2b	VOCs	Topcoat coatings used in FG1	3.5 lb/gal (minus water)* as applied	Instantaneous	SC 1.6	R336.1702(c)
* The phrase "minus water" shall also include compounds which are used as organic solvents and which are excluded from the definition of volatile organic compound. <b>[R336.1602(4)]</b>						

**Process / Operational Limits**

- 1.3 The permittee shall capture all waste materials (coatings, reducers, cleanup solvents, etc.) and shall store them in closed containers. The permittee shall dispose of all waste materials (coatings, cleanup solvents, etc.) in an acceptable manner in compliance with all applicable state rules and federal regulations. **[R336.1224, R336.1702(a)]**
- 1.4 The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **[R336.1224, R336.1370]**

**Equipment**

- 1.5 The permittee shall not operate any spray booth associated with FG1 unless each spray booth's respective exhaust filters are installed, maintained and operated in a satisfactory manner. **[R336.1301, R336.1331, R336.1901, R336.1910]**

**Testing**

- 1.6 The permittee shall determine the VOC content, water content and density of any coating, catalyst, reducer and/or cleanup solvent, as applied and as received, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's VOC formulation data using EPA Test Method 24, or an alternate method as approved by the District Supervisor. **[R336.1224, R336.1225, R336.1702(a)]**

**Recordkeeping /Reporting /Notification**

- 1.7 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **[R336.1224, R336.1225, R336.1702(a)]**
- 1.8 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (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 as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **[R336.1224, R336.1225, R336.1702(a)]**
- 1.9 The permittee shall keep the following information on a monthly basis for the primer and topcoat application processes associated with FG1:
- a) Gallons (with water) of each coating, catalyst and reducer used in the primer application process.
  - b) Gallons (with water) of each coating, catalyst and reducer used in the topcoat application process.
  - c) VOC content (minus water and with water) of each coating, catalyst and reducer as received and as applied used in the primer and topcoat application processes.
  - d) The density of each catalyst and reducer used.
  - e) VOC mass emission calculations determining the monthly emission rate in tons per calendar month for the primer and topcoat application processes combined.
  - f) 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 for the primer and topcoat application processes combined.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **[R336.1224, R336.1225, R336.1702(a)]**

- 1.10 The permittee shall keep the following information on a monthly basis for the use of purge and clean-up solvents associated with FG1:
- a) Gallons of each solvent used and reclaimed.
  - b) Gallons of acetone used and reclaimed.
  - c) VOC content, in pounds per gallon, of each solvent used.
  - d) VOC and Acetone combined emission calculations determining the monthly emission rate in tons per calendar month and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **[R336.1224, R336.1225, R336.1702(a)]**

- 1.11 The permittee shall maintain a filter change out log in a format acceptable to the AQD District Supervisor, which documents the maintenance of spray booth filters. **[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>
1.12a	SV001A	36	26	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
1.12b	SV001B	12	26	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
1.12c	SV002A	36	26	R336.1225, R336.1901, 40 CFR 52.21(c) & (d)
1.12d	SV002B	12	26	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: FGFACILITY**

**Emission Limits**

	<b>Pollutant</b>	<b>Equipment</b>	<b>Limit</b>	<b>Time Period</b>	<b>Testing/ Monitoring Method</b>	<b>Applicable Requirements</b>
2.1a	Each Individual HAP	FGFACILITY	Less than 9.0 tpy	12-month rolling time period as determined at the end of each calendar month	SC 2.4	R336.1205(3)
2.1b	Aggregate HAPs	FGFACILITY	Less than 22.5 tpy	12-month rolling time period as determined at the end of each calendar month	SC 2.4	R336.1205(3)

**Testing**

2.2 The permittee shall determine the HAP content of any material (coating, reducer, catalyst, cleanup solvent, etc.) as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. **[R336.1205(3)]**

**Recordkeeping / Reporting / Notification**

2.3 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **[R336.1205(3)]**

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

- a) Gallons or pounds of each HAP containing material used.
- b) Where applicable, gallons or pounds of each HAP containing material reclaimed.
- c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing 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 permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **[R336.1205(3)]**