

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

June 11, 2007

**PERMIT TO INSTALL
No. 125-07**



ISSUED TO
Dana Container, Inc.

LOCATED AT
11430 Russell Street
Detroit, Michigan 48211

IN THE COUNTY OF
Wayne

**STATE REGISTRATION NUMBER
M4626**

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: 4/12/2007	
DATE PERMIT TO INSTALL APPROVED: 6/11/2007	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

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
FG	Flexible Group	H ₂ 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	NOx	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 ₂	Sulfur Dioxide
ROP	Renewable Operating Permit	THC	Total Hydrocarbons
SC	Special Condition	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. **(R 336.1201(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. **(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 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 R 336.1219. The notification shall include all of the information required by R 336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R 336.1219(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. **(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 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). **(R 336.1912)**

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 R 336.1301, 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 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. The Department may require the permittee to conduct acceptable performance tests, at the permittee'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

Emission Unit Identification

Emission Unit ID	Emission Unit Description	Stack Identification
EU-4SINK	Four sink SP-7760A solvent cleaner used to clean valves and other parts from the totes.	SV-VENT
EU-AGITATOR	11.25 ft ² SP-7760A agitator solvent cleaner used to clean agitators from the totes.	SV-VENT
EU-LIDTANK	12 ft ² SP-7760A lid tank solvent cleaner used to clean rings and lids from the totes.	SV-VENT
EU-DRAINRACK	Rack for draining residual material from the totes prior to cleaning.	SV-VENT
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.		

Flexible Group Identification

Flexible Group ID	Emission Units Included in Flexible Group	Stack Identification
FG-SP-7760A	EU-4SINK, EU-AGITATOR, EU-LIDTANK	SV-VENT
FG-FACILITY	All process equipment at the facility including equipment covered by other permits, grand-fathered equipment and exempt equipment.	NA

The following conditions apply to: EU-DRAINRACK

Description: Rack for draining residual material from the totes prior to cleaning

Emission Limits

	Pollutant	Limit	Time Period	Equipment	Testing/ Monitoring Method	Applicable Requirement
1.1a	VOC	7 tpy	12-month rolling time period as determined at the end of each calendar month	EU-DRAINRACK	SC 1.6, 1.7	R 336.1225 R 336.1702(a)

Process/Operational Limits

- 1.2 The permittee shall not drain more than 15,000 totes in EU-DRAINRACK per 12-month rolling time period, as determined at the end of each calendar month. **(R 336.1225, R 336.1702(a))**
- 1.3 The permittee shall maintain written operating procedures for EU-DRAINRACK. These written procedures shall be posted in an accessible, conspicuous location near EU-DRAINRACK. **(R 336.1225, R 336.1702(a))**

Equipment

- 1.4 The permittee shall cover the EU-DRAINRACK receiving tank whenever material is not being drained into it. **(R 336.1225, R 336.1702(a))**

Recordkeeping/Reporting/Notification

- 1.5 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1225, R 336.1702(a))**
- 1.6 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the number of clean totes shipped, the total weight of those totes when received, and the total weight of those totes when shipped. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
- 1.7 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period VOC emission rate calculations for EU-DRAINRACK. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirements
1.8	SV-VENT	48	36.33	R 336.1225
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

The following conditions apply to: FG-SP-7760A

Description: SP-7760A solvent cleaning equipment

Emission Unit IDs: EU-4SINK, EU-AGITATOR, EU-LIDTANK

Emission Limits

	Pollutant	Limit	Time Period	Equipment	Testing/ Monitoring Method	Applicable Requirement
2.1a	VOC	7.3 tpy	12 month rolling time period as determined at the end of each calendar month	FG-SP-7760A	SC 2.9, 2.11, 2.12, 2.13, 2.14, 2.15	R 336.1225, R 336.1702(a)

Material Usage Limits

2.2 The permittee shall not use more than 15,000 pounds of SP-7760A, hereinafter "solvent", per year based on a 12-month rolling period as determined at the end of each calendar month. The permittee shall determine the amount of solvent used on a "net usage" basis. "Net usage" is defined as the amount of solvent added to FG-SP-7760A less any amount of solvent removed as waste. **(R 336.1225, R 336.1702(a))**

Process/Operational Limits

2.3 Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. **(R 336.1707(3)(b))**

2.4 The permittee shall maintain written operating procedures for each FG-SP-7760A cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cleaner. **(R 336.1225, R 336.1702(a), R 336.1707(4))**

Equipment

2.5 A device shall be available for each FG-SP-7760A cleaner for draining cleaned parts. **(R 336.1707(3)(b))**

2.6 Each FG-SP-7760A cleaner shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1707(3)(a))**

2.7. Each FG-SP-7760A cover shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**

2.8 If the Reid vapor pressure of any solvent used in any FG-SP-7760A cleaner is greater than 0.6 psia; or, if any solvent used in any FG-SP-7760A cleaner is heated above 120 degrees Fahrenheit, then the FG-SP-7760A cleaner must comply with at least one of the following provisions:

- a. The cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
- b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
- c. The cleaner shall be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

Monitoring

2.9 If the solvent in any FG-SP-7760A cleaner is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1225, R 336.1702(a))**

Recordkeeping/Reporting/Notification

2.10 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1225, R 336.1702(a))**

2.11 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. The permittee shall determine the amount of solvent used on a "net usage" basis. "Net usage" is defined as the amount of solvent added to FG-SP-7760A less any amount of solvent removed as waste. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

2.12 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period VOC emission rate calculations for FG-SP-7760A. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

2.13 The permittee shall keep, in a satisfactory manner, weekly records of the FG-SP-7760A solvent temperature, as required by SC 2.9. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**

2.14 The permittee shall maintain the following information on file for FG-SP-7760A: **(R 336.1225, R 336.1702(a))**

- a. The Reid vapor pressure of each solvent used.
- b. If applicable, the option chosen to comply with Rule 707(2).

2.15 As noted in Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1225, R 336.1702(a), R 336.1707(3)(c))**

Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirements
2.16	SV-VENT	48	36.33	R 336.1225
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

The following conditions apply to: FG-FACILITY

Emission Limits

	Pollutant	Limit	Time Period	Equipment	Testing/ Monitoring Method	Applicable Requirement
3.1a	Each individual HAP	8.9 tpy	12 month rolling time period as determined at the end of each calendar month	FG-FACILITY	SC 3.3	R 336.1205(3)

Recordkeeping/Reporting/Notification

- 3.2 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205(3))**
- 3.3 The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period calculations of the emission rate of each individual HAP for FG-FACILITY. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1205(3))**