

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY  
AIR QUALITY DIVISION**

August 19, 2019

**PERMIT TO INSTALL  
45-14B**

**ISSUED TO**  
Gerber Products Company

**LOCATED AT**  
405 State Street  
Fremont, Michigan

**IN THE COUNTY OF**  
Newaygo

**STATE REGISTRATION NUMBER**  
A4338

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. 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>July 15, 2019</b>	
DATE PERMIT TO INSTALL APPROVED: <b>August 19, 2019</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

**PERMIT TO INSTALL**

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## COMMON ACRYONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

**POLLUTANT / MEASUREMENT ABBREVIATIONS**

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO <sub>2</sub> e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO <sub>2</sub>	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 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 48909-7760, 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 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 and 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 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.
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 SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Process Equipment &amp; Control Devices)</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EUBOILER1	67.3 MMBtu Natural gas and No. 2 fuel oil fired boiler capable of producing 50,000 pounds of steam per hour.	01/01/1983 01/01/1996	FGBOILERS
EUBOILER2	67.3 MMBtu Natural gas and No. 2 fuel oil fired boiler capable of producing 50,000 pounds of steam per hour.	01/01/1983 01/01/1996	FGBOILERS
EUBOILER4	84.4 MMBtu Natural gas fired boiler capable of producing 70,000 pounds of steam per hour	07/23/2015	FGBOILERS
EUCATERPILLAR	1200 HP 750 kW Caterpillar diesel-fueled emergency generator.	01/01/1994	FGGENERATORS
EUDETROITDIESEL	325 HP 250 kW Detroit Diesel diesel-fueled emergency generator, used for lighting.	11/01/1999	FGGENERATORS
EUCUMMINS	364 HP 200kw Cummins diesel-fueled emergency generator.	11/09/2009	FGGENERATORS
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 SUMMARY TABLE**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGBOILERS	Two 67.3 MMBtu per hour natural gas and No. 2 fuel oil fired boilers, each capable of producing 50,000 pounds of steam per hour, And one 84.4 MMBtu per hour natural gas fired boiler capable of producing 70,000 pounds of steam per hour	EUBOILER1, EUBOILER2, EUBOILER4
FGGENERATORS	Three diesel-fueled emergency generators	EUCATERPILLAR, EUDETROITDIESEL, EUCUMMINS
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	

**The following conditions apply to: FGBOILERS**

**DESCRIPTION:** Two 67.3 MMBtu per hour natural gas and No. 2 fuel oil fired boilers, each capable of producing 50,000 pounds of steam per hour, And one 84.4 MMBtu per hour natural gas fired boiler capable of producing 70,000 pounds of steam per hour.

**Emission Units:** EUBOILER1, EUBOILER2, EUBOILER4

**POLLUTION CONTROL EQUIPMENT:**

N/A

**I. EMISSION LIMITS:**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. NOx	6.2 pph	Test Protocol*	Each: EUBOILER1, EUBOILER2	SC V.1	R336.1205(1) 40 CFR 52.21(c) & (d)
2. CO	6.1 pph	Test Protocol*	Each: EUBOILER1, EUBOILER2	SC V.1	R336.1205(1) 40 CFR 52.21(c) & (d)
3. NOx	8.3 pph	Test Protocol*	EUBOILER4	SC V.1	R336.1205(1) 40 CFR 52.21(c) & (d)
4. CO	7.0 pph	Test Protocol*	EUBOILER4	SC V.1	R336.1205(1) 40 CFR 52.21(c) & (d)

\*Test protocol shall specify averaging time.

**II. MATERIAL LIMITS:**

1. The permittee shall not burn more than 85,442 gallons of No. 2 fuel oil per year in FGBOILERS on a 12-month rolling basis. **(R336.1205(1))**
2. The permittee shall not burn No. 2 fuel oil with greater than 1.0% sulfur content by weight in FGBOILERS. **(R3361.205(1), R 336.1402)**
3. The permittee shall only burn pipeline quality natural gas in EUBOILER4. **(R3361.205(1))**

**III. PROCESS/OPERATIONAL RESTRICTIONS:**

N/A

**IV. DESIGN/EQUIPMENT PARAMETERS:**

N/A

**V. TESTING/SAMPLING:**

1. Upon written request of the AQD District Supervisor, the permittee shall verify NOx and/or CO emission rates from any boiler of FGBOILERS, by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing.

Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. **(R 336.2001, R 336.2003, R 336.2004, R 336.1205, 40 CFR 52.21(c) & (d))**

**VI. MONITORING/RECORDKEEPING:**

1. 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 monitoring/recordkeeping special condition. **(R 336.1205(1) & (3))**
2. The permittee shall monitor, in a satisfactory manner, the No.2 fuel oil usage for each boiler of FGBOILERS on a continuous basis. **(R 336.1205(1) & (3))**
3. The permittee shall calculate, in a satisfactory manner, the gallons of No. 2 fuel oil and the amount of natural gas (cubic feet) combusted in FGBOILERS on a monthly and 12-month rolling basis. **(R 336.1205(1) & (3))**
4. The permittee shall keep, in a satisfactory manner, fuel oil supplier certification records or fuel oil sample test data, for each delivery of fuel oil used in FGBOILERS, demonstrating that the fuel sulfur content meets the requirement of SCII.2. The certification or test data shall include the name of the oil supplier or laboratory, and the sulfur content of the fuel oil. **(R 336.1205(1) & (3))**

**VII. REPORTING:**

N/A

**VIII. STACK/VENT RESTRICTIONS:**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVBOILERS1&2	58	110	40 CFR 52.21(c) & (d)
2. SVBOILER4	40	90	40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENTS:**

N/A

**The following conditions apply to: FGGENERATORS**

**DESCRIPTION:** Three diesel fueled emergency generators

**Emission Units:** EUCATERPILLAR, EUDETROITDIESEL, EUCUMMINS

**POLLUTION CONTROL EQUIPMENT:**

N/A

**I. EMISSION LIMITS:**

N/A

**II. MATERIAL LIMITS:**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS:**

1. The permittee shall not operate each engine of FGGENERATORS for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. **(R 336.1205(1) & (3))**

**IV. DESIGN/EQUIPMENT PARAMETERS:**

1. The permittee shall equip and maintain each engine of FGGENERATORS with non-resettable hours meters to track the operating hours. **(R 336.1205(1) & (3))**

**V. TESTING/SAMPLING:**

N/A

**VI. MONITORING/RECORDKEEPING:**

1. 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 monitoring/recordkeeping special condition. **(R 336.1205(1) & (3))**
2. The permittee shall monitor and record the hours of operation of each engine of FGGENERATORS, on a monthly and 12-month rolling time period basis, in a manner that is acceptable to the District Supervisor, Air Quality Division. **(R 336.1205(1) & (3))**

**VII. REPORTING:**

N/A

**VIII. STACK/VENT RESTRICTIONS:**

N/A

**IX. OTHER REQUIREMENTS**

1. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to each engine of FGGENERATORS. **(40 CFR Part 63 Subparts A and ZZZZ, 40 CFR 63.6595)**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b)

**The following conditions apply Source-Wide to: FGFACILITY**

**I. EMISSION LIMITS:**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. NOx	99 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.4	R 336.1205(1)
2. CO	99 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.4	R 336.1205(1)
3. CO <sub>2e</sub>	89,730 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.4	R 336.1205(3)
4. Each Individual HAP	9.9 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.5	R 336.1205(1)
5. Aggregate HAPs	24.9 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.5	R 336.1205(1)
6. VOCs	99 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.4	R 336.1205(1)

**II. MATERIAL LIMITS:**

1. The natural gas usage for FGFACILITY shall not exceed 1,453 MMSCF per year based on a 12-month rolling time period as determined at the end of each calendar month. **(R 336.1205 (1) & (3))**

**III. PROCESS/OPERATIONAL RESTRICTIONS:** N/A

**IV. DESIGN/EQUIPMENT PARAMETERS:** N/A

**V. TESTING/SAMPLING:** N/A

**VI. MONITORING/RECORDKEEPING:**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(1) & (3))**

2. The permittee shall monitor and record, in a satisfactory manner, the total natural gas usage at FGFACILITY on a continuous basis. **(R 336.1205(1) & (3))**
3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period natural gas use records for FGFACILITY. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(1) & (3))**
4. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period NO<sub>x</sub>, VOC, CO, and CO<sub>2e</sub> emission calculation records for FGFACILITY. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(1) & (3))**
5. The permittee shall keep the following information, on a monthly basis, for FGFACILITY:
  - a) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
  - b) 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.**(R 336.1205(1))**

**VII. REPORTING:**

N/A

**VIII. STACK/VENT RESTRICTIONS:**

N/A

**IX. OTHER REQUIREMENTS:**

N/A

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).