

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

February 23, 2017

PERMIT TO INSTALL
212-16

ISSUED TO
Wright Coating Technologies

LOCATED AT
1603 North Pitcher Street
Kalamazoo, Michigan

IN THE COUNTY OF
Kalamazoo

STATE REGISTRATION NUMBER
N0991

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: January 23, 2017	
DATE PERMIT TO INSTALL APPROVED: February 23, 2017	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	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	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.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU-Line-01	Plastisol coating dip tank line consists of natural gas fired preheat and cure ovens. Also, associated clean-up solvents included. Formerly operated under PTI No. 244-85.	06-12-1985 / NA	FG-Lines, FG-Facility
EU-Line-03	Plastisol spray line consists of a coating booth and shared natural gas fired cure oven (from EU-Line-04). Also, associated purge and clean-up solvents included. Formerly operated under PTI No. 246-85A.	05-04-1989 / NA	FG-Lines, FG-Facility
EU-Line-04	Application of plastisol powder coating via spray gun or dip tank consisting of natural gas fired preheats and cures ovens. Use of a cyclone and baghouse to capture powder coating (internally vented). Also, associated purge and/or clean-up solvents included. Formerly operated under PTI No. 247-85A.	02-08-1989 / NA	FG-Lines, FG-Facility
EU-Line-05	Parts being alkaline wash, rinse, and dry. Then the parts are sprayed with powder coating, a vinyl or nylon primer, or liquid paint in a two-part booth. The parts then go to the natural gas fired cure oven. The powder coating is controlled by a cyclone and baghouse (internally vented). Also, associated purge and/or clean-up solvents included. Formerly operated under PTI No. 681-87B.	05-15-1991 / NA	FG-Lines, FG-Facility
EU-CleanUpBooth	A clean up booth. Formerly operated under PTI No. 690-91.	05-28-1991 / NA	FG-Lines, FG-Facility
EU-Furnace	Pacific Kiln #500: A natural gas-fired pyrolysis paint stripping furnace. Formerly operated under PTI No. 604-89.	08-18-1989 / NA	FG-Facility
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.			

The following conditions apply to: EU-Furnace

DESCRIPTION: Pacific Kiln #500: A natural gas-fired pyrolysis paint stripping furnace.

Flexible Group ID: FG-Facility

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Visible Emissions	20% opacity	6-minute average	EU-Furnace	SC V.1	R 336.1301
2. PM	0.1 lbs per 1000 lbs of exhaust gases ^a	Test Protocol*	EU-Furnace	SC V.1	R 336.1331
^a Corrected to 50% excess air *Test protocol shall specify averaging time					

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall dispose of all collected ash in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1370)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EU-Furnace unless the furnace is installed, maintained, and operated in a satisfactory manner. Satisfactory manner includes maintaining a minimum temperature of 1400°F and a minimum retention time of 0.30 second in the secondary chamber. **(R 336.1301, R 336.1910)**
2. The permittee shall not operate EU-Furnace unless it is equipped with a thermocouple control system for the afterburner. **(R 336.1301, R 336.1910)**

V. TESTING/SAMPLING

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

1. Upon request from AQD District Supervisor, the permittee shall verify particulate emissions rate from EU-Furnace 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, 40 CFR 52.21(c) & (d))**

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

NA

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:

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-Furnace	24 x 24	25	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

NA

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-Lines	Four coating lines and a clean-up booth. Also, associated purge and/or clean-up solvents included.	EU-Line-01, EU-Line-03, EU-Line-04, EU-Line-05, EU-CleanUpBooth
FG-Facility	All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment. Formerly covered under PTI No. 218-01.	NA

The following conditions apply to: FG-Lines

DESCRIPTION: Four coating lines and a clean-up booth. Also, associated purge and/or clean-up solvents included.

Emission Unit ID: EU-Line-01, EU-Line-03, EU-Line-04, EU-Line-05, EU-CleanUpBooth

POLLUTION CONTROL EQUIPMENT: Particulate filters for EU-Line-03, EU-Line-04, and EU-Line-05

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Visible Emissions	No visible emissions	6-minute average	EU-Line-01, EU-Line-03, EU-Line-04, EU-Line-05, EU-CleanUpBooth	GC 13	R 336.1301
2. PM	0.01 lbs per 1000 lbs of exhaust gases ^a	Test Protocol*	EU-Line-04, EU-Line-05, EU-CleanUpBooth	SC V.2	R 336.1331
3. VOC	0.7 tpy	12-month rolling time period as determined at the end of each calendar month	EU-Line-01	SC V.2, SC VI.3	R 336.1702
4. VOC	1.4 tpy	12-month rolling time period as determined at the end of each calendar month	EU-Line-03	SC VI.3	R 336.1702
5. VOC	4.93 tpy	12-month rolling time period as determined at the end of each calendar month	EU-Line-04	SC VI.3	R 336.1702
6. VOC	13.4 tpy	12-month rolling time period as determined at the end of each calendar month	EU-Line-05	SC VI.3	R 336.1702
^a Corrected on dry gas basis *Test protocol shall specify averaging time					

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Coating used for Metal Furniture Parts and Products	1,000 gallons, as applied	12-month rolling time period as determined at the end of each calendar month	EU-Line-05	SC VI.4	40 CFR Part 60, Subparts A and EE

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste plastisol, coatings, paints, thinners, purge and clean up solvents, epoxy, *etc.* (materials) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**
2. For EU-Line-03, EU-Line-04, EU-Line-05, and EU-CleanUpBooth, the permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EU-Line-03, EU-Line-04, EU-Line-05, and/or EU-CleanUpBooth unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. **(R336.1224, R336.1301, R336.1331, R336.1910)**

V. TESTING/SAMPLING

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

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**
2. Upon request from AQD District Supervisor, the permittee shall verify VOC emissions rate (EU-Line-01, EU-Line-04) and particulate emissions rates (EU-Line-04) 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 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004)**

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 by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702)**
2. 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 as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1225, R 336.1702)**

3. The permittee shall keep the following information on a calendar month basis for FG-Lines:
 - a) Gallons (with water) of each plastisol, coating, paint, thinner, purge and clean up solvents, epoxy, *etc.* (materials) used and reclaimed.
 - b) VOC content (with water) of each material as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in pounds and tons per calendar month separately for EU-Line-01, EU-Line-03, EU-Line-04, and EU-Line-05.
 - d) 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 separately for EU-Line-01, EU-Line-03, EU-Line-04, and EU-Line-05.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702)**

4. The permittee shall record, in a satisfactory manner, the amount of coatings used for metal furniture parts or products in EU-Line-05 in gallons per month and in gallons per 12-month rolling time period as determined at the end of each calendar month. The permittee shall keep the records on file at the facility and make them available to the Department upon request. **(40 CFR Part 60, Subparts A and EE)**

VII. REPORTING

NA

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 except for SV-CleanUpBooth (Clean-Up Booth Stack):

Stack & Vent ID	Maximum Exhaust Diameter/ Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-Line-01 (Line 1)	8	27	40 CFR 52.21(c) & (d)
2. SV-Line-03 (Line 3)	18	23	40 CFR 52.21(c) & (d)
3. SV-Line-04a (Line 4)	10	17	40 CFR 52.21(c) & (d)
4. SV-Line-04b (Line 4)	10	17	40 CFR 52.21(c) & (d)
5. SV-Line-04c (Line 4)	10	17	40 CFR 52.21(c) & (d)
6. SV-Line-05a (Line 5: Booth 1)	34	40	40 CFR 52.21(c) & (d)
7. SV-Line-05b (Line 5: Booth 2)	34	40	40 CFR 52.21(c) & (d)
8. SV-CleanUpBooth (Clean-Up Booth)	24 x 24	19.5	40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources of Surface Coating of Metal Furniture as specified in 40 CFR Part 60 Subparts A and Subpart EE, as they apply to EU-Line-05. **(40 CFR Part 60, Subparts A and EE)**

The following conditions apply Source-Wide to: FG-Facility

DESCRIPTION: All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment.

Emission Unit ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	8.9 tpy	12-month rolling time period as determined at the end of each calendar month	FG-Facility	SC VI.3	R 336.1205(3)
2. Aggregate HAPs	22.4 tpy	12-month rolling time period as determined at the end of each calendar month	FG-Facility	SC VI.3	R 336.1205(3)

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

1. The permittee shall determine the HAP content of any material 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. **(R 336.1205(3))**

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 by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3), 40 CFR 60, Subpart EE)**
2. 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 as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**
3. The permittee shall keep the following information on a calendar month basis for FG-Facility:
 - 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 using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(3))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources of Surface Coating of Metal Furniture as specified in 40 CFR Part 60 Subparts A and Subpart EE. **(40 CFR Part 60, Subparts A and EE)**