

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

February 27, 2024

**PERMIT TO INSTALL  
18-24**

**ISSUED TO  
Sunsation Products, Inc.**

**LOCATED AT  
6051 Starville Road  
Cottrellville, Michigan 48039**

**IN THE COUNTY OF  
Saint Clair**

**STATE REGISTRATION NUMBER  
P1404**

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>January 26, 2024</b>	
DATE PERMIT TO INSTALL APPROVED: <b>February 27, 2024</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

**PERMIT TO INSTALL**

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## COMMON ACRONYMS

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

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

### 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

## 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 Environment, Great Lakes, and Energy, 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 Rule 210 (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 Rule 219 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 Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(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 condition 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 Rule 301, 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 Rule 303 (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 Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

**EMISSION UNIT 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 (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EURESIN	Non-atomized (flowcoater) resin application of materials to manufacture boat parts and molds. No spray booth associated with resin application process. Process includes production resin, tooling resin, putties, corebond materials, catalyst materials and other associated materials.	TBD	FGFIBERGLASS
EUGELCOAT	Atomized application of gelcoat materials to molds. No spray booth associated with gelcoat application process. Process includes production gelcoats (clear and pigmented), tooling gelcoats, wax solutions, catalyst materials and other associated materials.	TBD	FGFIBERGLASS
EUCLEANUP	Miscellaneous cleanup activities, acetone and non-VOC/non-HAP cleaning solutions used.	TBD	FGFIBERGLASS
EUADHESIVE	Adhesive products used in the manufacturing of boat parts.	TBD	FGFIBERGLASS

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 336.1291.

### FLEXIBLE GROUP SPECIAL CONDITIONS

#### 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>
FGFIBERGLASS	Fiberglass lamination of molds and boat parts.	EURESIN, EUGELCOAT, EUCLEANUP, EUADHESIVE

**FGFIBERGLASS  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Fiberglass lamination of molds and boat parts.

**Emission Units:** EURESIN, EUGELCOAT, EUCLEANUP, EUADHESIVE

**POLLUTION CONTROL EQUIPMENT**

Ventilation stacks are equipped with particulate filters.

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC (including styrene)	9.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGFIBERGLASS	SC VI.2, SC VI.3(e)	R 336.1225(1) and (2), R 336.1702(a)
2. Acetone	8.1 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month	FGFIBERGLASS	SC VI.2, SC VI.3(k)	R 336.1224, R 336.1225(1)

The emission limits are based upon calculating styrene and methyl methacrylate (MMA) using the emission factors identified in EF Table 1: Unified Emission Factors of Open Molding of Composites (Revised and Approved: 10/13/2009) located at <http://www.acmanet.org/ga/ACMA-UEF-1-2011a.pdf>

**II. MATERIAL LIMIT(S)**

- The permittee shall not exceed the weighted-average monomer (styrene and MMA) VOC content limits listed in the following table for the following materials. If the non-monomer VOC content of a resin or gel coat exceeds 5% by weight, the excess non-monomer VOC must be added to the monomer VOC of the resin or gel coat. **(R 336.1225, R 336.1702)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
a) Weighted-Average Monomer VOC Content of pigmented gelcoat	33% by weight*	12-month rolling average as determined at the end of each calendar month	EUGELCOAT	SC VI.2, SC VI.3(f)	R 336.1702(d)
b) Weighted-Average Monomer VOC Content of clear gelcoat	48% by weight*	12-month rolling average as determined at the end of each calendar month	EUGELCOAT	SC VI.2, SC VI.3(g)	R 336.1702(d)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
c) Weighted-Average Monomer VOC Content of tooling gelcoat	40% by weight*	12-month rolling average as determined at the end of each calendar month	EUGELCOAT	SC VI.2, SC VI.3(h)	R 336.1702(d)
d) Weighted-Average Monomer VOC Content of Production Resin	35% by weight*	12-month rolling average as determined at the end of each calendar month	EURESIN	SC VI.2, SC VI.3(i)	R 336.1702(d)
e) Weighted-Average Monomer VOC Content of Tooling Resin	39% by weight*	12-month rolling average as determined at the end of each calendar month	EURESIN	SC VI.2, SC VI.3(j)	R 336.1702(d)

\* Beginning on the permit issuance date, and continuing for the first 12 calendar months, this limit applies to the cumulative average VOC Content of the prior months. Thereafter, the limit shall become a 12-month rolling limit.

The following formula shall be used to calculate the weighted-average monomer VOC content:

Where:

$$W_i = \text{Weight of Material } i$$

$$V_i = \text{Monomer VOC Content of Material } i$$

(Note: If the non-monomer VOC content of a resin or gel coat exceeds 5% by weight, the excess non-monomer VOC must be added to the monomer VOC of the resin or gel coat)

$$M_{WA} = \text{Weighted Average Monomer VOC Content}$$

$$M_{WA} = \frac{\sum_{i=1}^n (W_i * V_i)}{\sum_{i=1}^n (W_i)}$$

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall capture all waste cleanup solvent(s), catalyst(s), resin(s), and gelcoat(s) used in FGFIBERGLASS. The permittee shall store these materials in closed containers and shall dispose of them in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1224, R 336.1702(a))**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall equip and maintain the resin application process within FGFIBERGLASS (i.e. production and tooling resin applications) with non-atomized applicators or technology with equivalent or lower styrene emission rates. The permittee shall equip and maintain the gelcoat application process within FGFIBERGLASS with mechanical applicators or technology with equivalent or lower styrene emission rates. **(R 336.1225, R 336.1702(a))**

**V. TESTING/SAMPLING**

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

NA

## **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(a))**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (i.e. resin(s), gelcoat(s), catalyst(s), 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 and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702(a))**
3. The permittee shall keep the following information for each calendar month for FGFIBERGLASS:
  - a) The identity and amount (in pounds) of each material used. Materials include, but are not limited to: production and/or tooling resins, gelcoats (all colors), tooling gelcoats, catalyst, putty, adhesive, wax solutions, cleanup solvent (acetone), etc.
  - b) The styrene content, MMA content, acetone content, and total VOC content of each material used.
  - c) Where applicable, gallons or pounds of acetone reclaimed.
  - d) The appropriate emission factor for each raw material used:
    - i. The Unified Emission Factors (UEF) Table 1 for Open Molding of Composites from the American Composites Manufacturers Association (ACMA), October 2009, shall be used only for styrene and MMA emission calculations for open molding processes.
    - ii. Mass balance used for non-styrene, non-MMA VOC emissions.
    - iii. Alternate emission factors may be used with the approval of the AQD District Supervisor.
  - e) VOC 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.
  - f) Calculations determining the weighted-average monomer VOC content of pigmented gelcoat as applied on a calendar month and 12-month rolling time period as determined at the end of each calendar month.
  - g) Calculations determining the weighted-average monomer VOC content of clear gelcoat as applied on a calendar month and 12-month rolling time period as determined at the end of each calendar month.
  - h) Calculations determining the weighted-average monomer VOC content of tooling gelcoat as applied on a calendar month and 12-month rolling time period as determined at the end of each calendar month.
  - i) Calculations determining the weighted-average monomer VOC content of production resin as applied on a calendar month and 12-month rolling time period as determined at the end of each calendar month.
  - j) Calculations determining the weighted-average monomer VOC content of tooling resin as applied on a calendar month and 12-month rolling time period as determined at the end of each calendar month.
  - k) Acetone 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, using mass balance or an alternate method as approved by the AQD District Supervisor.

The permittee shall keep the records using the UEF table, mass balance, or an alternative method acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702)**

## **VII. REPORTING**

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of FGFIBERGLASS. **(R 336.1201(7)(a))**

**VIII. STACK/VENT RESTRICTION(S)**

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. SV-LAMINATION1	48	68	R 336.1225 40 CFR 52.21(c) & (d)
2. SV-LAMINATION2	48	68	R 336.1225 40 CFR 52.21(c) & (d)

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

## FGFACILITY CONDITIONS

**DESCRIPTION:** The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment and exempt equipment.

### POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing 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	FGFACILITY	SC VI.2	R 336.1205(3)
2. Aggregate HAPs	22.4 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(3)

#### II. MATERIAL LIMIT(S)

NA

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

#### IV. DESIGN/EQUIPMENT PARAMETER(S)

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 (i.e. resin, gelcoat, cleanup solvent, adhesive, 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. **(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 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205(3))**
2. 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 cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, 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 RESTRICTION(S)**

NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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