

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

June 28, 2024

PERMIT TO INSTALL
76-24

ISSUED TO
Haviland Consumer Products

LOCATED AT
2168 Avastar Parkway NW
Walker, Michigan 49544

IN THE COUNTY OF
Kent

STATE REGISTRATION NUMBER
N0878

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: February 15, 2024	
DATE PERMIT TO INSTALL APPROVED: June 28, 2024	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 _{2e}	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 ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	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 ₂	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 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 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.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Flexible Group ID
EUHAVISTARPOW	Bagging and blending process located in the north building consisting of 2 baggers and a fill line. The emissions from the baggers (31001 and 31002) and the fill line (31069) are controlled a wet scrubber that exhausts through SV-18 or the internally vented portable dust collector, depending on the materials being processed.	NA

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.

EUHAVISTARPOW EMISSION UNIT CONDITIONS

DESCRIPTION

Bagging and blending process located in the north building consisting of 2 baggers and a fill line. The emissions from the baggers (31001 and 31002) and the fill line (31069) are controlled by a wet scrubber that exhausts through SV-18 or the internally vented portable dust collector, depending on the materials being processed.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Wet scrubber
 Portable dust collector

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.1 lbs per 1,000 lbs of exhaust gas calculated on a dry gas basis	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2	R 336.1331
2. PM	0.749 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.3	R 336.1225
3. PM10	0.749 lb/hr	Hourly for SV-18	EUHAVISTARPOW	SC VI.2, VI.3	40 CFR 52.21 (c) and (d)
4. PM2.5	0.749 lb/hr	Hourly for SV-18	EUHAVISTARPOW	SC VI.2, VI.3	40 CFR 52.21 (c) and (d)
5. Nickel ^a	3.2 x 10 ⁻⁴ lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.4, VI.5	R 336.1225
6. Total boric acids ^b	0.45 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
7. PM2.5 TACs ^c	0.174 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC VI.2, VI.3	R 336.1225
8. PM10 TACs ^d	0.749 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC VI.2, VI.3	R 336.1225
9. Amorphous Silica ^e	0.149 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
10. Safrole (CAS # 94-59-7)	0.00109 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
11. Cobalt ^f	7.1 x 10 ⁻⁶ lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.4, VI.5	R 336.1225
12. Manganese ^g	0.016 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.4, VI.5	R 336.1225
13. Magnesium ^h	0.249 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
14. Magnesium Sulfate (CAS # 7487-88-9 and 10034-99-8)	0.124 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
15. Methyl Eugenol (CAS # 93-15-2)	0.00547 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
16. Formaldehyde (CAS # 50-00-0)	0.00437 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
17. Tetrasodium ethylenediamine tetraacetate (CAS # 64-02-8)	0.00547 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
18. Acrylamide (CAS # 79-06-1)	2.7 x 10 ⁻⁴ lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
19. Selenium ⁱ	0.0049 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
20. Pentapotassium bis(peroxy monosulphate) bis(sulphate) (CAS # 70693-62-8)	0.087 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
21. 2,4-Imidazolidinedione, 1-bromo-3-chloro-5,5-dimethyl-(CAS # 16079-88-2)	0.0049 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225
22. Sodium Hydroxide (CAS # 1310-73-2)	0.0079 lb/hr ¹	Hourly for SV-18	EUHAVISTARPOW	SC V.1, VI.2, VI.5	R 336.1225

- a. This limit applies to the nickel portion of the emissions of nickel containing compounds.
- b. This limit applies to the combined emissions of all boric acid compounds.
- c. This limit applies to the combined emissions of all TACs evaluated as PM2.5, including CAS #s 50-81-7, 77-92-9, 89-65-6, 108-80-5, 144-55-8, 497-19-8, 6132-04-3, 7647-14-5, 7681-38-1, 7760-50-1, 68081-81-2, 10058-23-8, 9003-05-8, 10102-17-7, 25155-30-0, 2893-78-9, 51580-86-0, 10043-52-4, and 7772-98-7.
- d. This limit applies to the combined emissions of all TACs evaluated as PM10, including CAS #s 65-85-0, and 7447-40-7.
- e. This limit applies to the combined emissions of compounds listed in Footnote 28 of the Toxics Screening Level Query Notes.
- f. This limit applies to the cobalt portion of the emissions of cobalt containing compounds.
- g. This limit applies to the manganese portion of the emissions of manganese containing compounds.
- h. This limit applies to the combined emissions of compounds listed in Footnote 38 of the Toxics Screening Level Query Notes.
- i. This limit applies to the combined emissions of compounds listed in Footnote 34 of the Toxics Screening Level Query Notes.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUHAVISTARPOW unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the wet scrubber and dust collector has been submitted and is implemented and maintained. The MAP shall, at a minimum, specify the following:
 - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
 - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUHAVISTARPOW equipment while processing materials requiring use of the wet scrubber unless the wet scrubber is installed, maintained, and operated in a satisfactory manner as specified in the MAP. **(R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d))**
2. The permittee shall equip and maintain the wet scrubber with a device to monitor pressure drop on a continuous basis. **(R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d))**
3. The permittee shall not operate EUHAVISTARPOW equipment while processing materials requiring use of the internally vented portable dust collector unless the internally vented portable dust collector is installed, maintained, and operated in a satisfactory manner as specified in the MAP. **(R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d))**
4. The permittee shall equip and maintain the wet scrubber with a device to monitor water flow rate on a continuous basis. **(R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d))**
5. The permittee shall equip and maintain the wet scrubber with a device that triggers an alarm when the pressure drop is outside of the range specified in the MAP. **(R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d))**

V. TESTING/SAMPLING

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

1. Upon request from the AQD District Supervisor, the permittee shall verify the nickel, total boric acids, amorphous silica, safrole, cobalt, manganese, magnesium, magnesium sulfate, methyl eugenol, formaldehyde, tetrasodium ethylenediaminetetraacetate, acrylamide, selenium, pentapotassium

bis(peroxymonosulphate) bis(sulphate), 2,4-imidazolidinedione, 1-bromo-3-chloro-5,5-dimethyl-, sodium hydroxide, and/or PM emission rates from EUHAVISTARPOW by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
Toxic air contaminants	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 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, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit 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 336.1224, R 336.1225, R 336.1331, 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))**

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 336.1224, R 336.1225, R 336.1331, R 336.1702, 40 CFR 52.21 (c) and (d))**
2. The permittee shall keep, in a satisfactory manner, records of the wet scrubber pressure drop and flow rate every three hour block while EUHAVISTARPOW is operating. The time between each recorded pressure drop shall be at least 1.5 hours. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d))**
3. The permittee shall calculate and keep, in a satisfactory manner, production records and other records necessary to calculate the PM, PM10, and PM2.5 hourly emission rates from EUHAVISTARPOW. The calculations shall be performed using the method demonstrated in the PTI application, or an alternative method acceptable to the District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, 40 CFR 52.21 (c) and (d))**
4. The permittee shall keep, in a satisfactory manner, records including each product produced in EUHAVISTARPOW demonstrating which control device (the wet scrubber or the portable dust collector exhausting inside the building) is required to be used when producing that product. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ **(R 336.1225)**
5. The permittee shall keep, in a satisfactory manner, a baseline emission calculation for each toxic air contaminant used in EUHAVISTARPOW. Each baseline emission calculation shall show expected pound per hour emission rate for each toxic air contaminant. The permittee shall keep all records on file at the facility and make them available to the Department upon request.¹ **(R 336.1224, R 336.1225)**
6. The permittee shall record times when the emissions are vented to the wet scrubber and the internally vented portable dust collector. **(R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d))**
7. The permittee shall record instances of alarms triggered by the pressure drop being outside of the range specified by the MAP. The permittee shall keep all records on file at the facility and make them

available to the Department upon request. (R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d))

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 EUHAVISTARPOW. (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:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-18	36	28	R 336.1225 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall maintain all process and control equipment with labels and shall label all new process and control equipment upon change or installation in a manner acceptable to the AQD District Supervisor. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. (R 336.1201)

Footnotes:

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