

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

MAY 27, 2021

**PERMIT TO INSTALL  
24-19B**

**ISSUED TO  
MICHIGAN METAL COATINGS COMPANY**

**LOCATED AT  
1720 DOVE STREET  
PORT HURON, MICHIGAN 48060**

**IN THE COUNTY OF  
ST. CLAIR**

**STATE REGISTRATION NUMBER  
N0950**

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:<br><b>May 6, 2021</b> |            |
| DATE PERMIT TO INSTALL APPROVED:<br><b>May 27, 2021</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>2e</sub> | 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<br/>(Including Process Equipment &amp; Control Device(s))</b>                                                                                                                                | <b>Flexible Group ID</b> |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| EUDIPSPIN               | A rack dip-drain-spin coating line that consists of an alkaline wash with a 1.22 MMBtu/hr boiler, shot blasting stations, three (3) dip-spin coating booths, two (2) natural gas-fired curing ovens, and a cooldown area. | 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.

**EUDIPSPIN  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A rack dip-drain-spin coating line that consists of an alkaline wash with a 1.22 MMBtu/hr boiler, shot blasting stations, three (3) dip-spin coating booths, two (2) natural gas-fired curing ovens, and a cooldown area.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Regenerative Thermal Oxidizer (RTO)

**I. EMISSION LIMIT(S)**

| <b>Pollutant</b> | <b>Limit</b> | <b>Time Period / Operating Scenario</b>                                      | <b>Equipment</b> | <b>Monitoring / Testing Method</b> | <b>Underlying Applicable Requirements</b> |
|------------------|--------------|------------------------------------------------------------------------------|------------------|------------------------------------|-------------------------------------------|
| 1. VOC           | 25 tpy       | 12-month rolling time period as determined at the end of each calendar month | EUDIPSPIN        | SC VI.2<br>SC VI.3                 | R 336.1702(a)                             |

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall capture all waste coatings and shall store them in closed containers. The permittee shall dispose of all waste coatings in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1225, R 336.1702(a))**
2. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1225, R 336.1702(a))**
3. The permittee shall not operate EUDIPSPIN unless a malfunction abatement plan (MAP) as described in Rule 911(2) 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 336.1225, R 336.1702(a), R 336.1910, R 336.1911)**

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

1. The permittee shall not operate the dip coating booths in EUDIPSPIN unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner acceptable to the AQD District Supervisor. Satisfactory operation of the thermal oxidizer includes a minimum VOC destruction efficiency of 95 percent (by weight), a minimum capture efficiency of 85 percent (by weight), maintaining a minimum temperature of 1,500 °F or the adjusted minimum temperature based on the most recent acceptable stack test which achieved a minimum destruction efficiency of 95 percent (by weight), and a minimum retention time of 0.5 seconds. **(R 336.1225, R 336.1702, R 336.1910)**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, acceptable to the AQD District Supervisor, a temperature monitoring device in the combustion chamber of the thermal oxidizer to monitor and record the temperature, on a continuous basis, during operation of EUDIPSPIN. **(R 336.1225, R 336.1702)**

#### **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 the AQD District Supervisor, the permittee shall verify the destruction efficiency from EUDIPSPIN by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR 60 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 336.1225, R 336.1702, R 336.2001, R 336.2003, R 336.2004)**
3. Upon request from the AQD District Supervisor, the permittee shall verify the capture efficiency from EUDIPSPIN by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 49 CFR 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 336.1225, 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 336.1224, R 336.1225, R 336.1702)**
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, 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 at the facility and make them available to the Department upon request. **(R 336.1224, R 336.1225, R 336.1702)**

3. The permittee shall keep the following information on a monthly basis for EUDIPSPIN:
- a) Gallons (with water) of each coating used and reclaimed.
  - b) VOC content (with water) of each coating as applied.
  - d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - e) 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.

The permittee shall keep the records using mass balance or an alternate 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 336.1225, R 336.1702)**

4. The permittee shall monitor and record, in a satisfactory manner acceptable to the AQD District Supervisor, the temperature in the combustion chamber of the thermal oxidizer, on a continuous basis, during operation of EUDIPSPIN. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. **(R 336.1224, R 336.1225, R 336.1702)**

## **VII. REPORTING**

NA

## **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-RTO                  | 52                                                    | 52.5                                      | R 336.1225,<br>40 CFR 52.21(c) & (d)      |
| 2. SV-OVEN1                | 33                                                    | 52.5                                      | R 336.1225,<br>40 CFR 52.21(c) & (d)      |
| 3. SV-OVEN2                | 33                                                    | 52.5                                      | R 336.1225,<br>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).