

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

January 25, 2023

**PERMIT TO INSTALL
16-23**

ISSUED TO
AKWEL – (Avon Automotive Cadillac Division)

LOCATED AT
603 West Seventh Street
Cadillac, Michigan 49601

IN THE COUNTY OF
Wexford

STATE REGISTRATION NUMBER
A9365

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: October 21, 2022	
DATE PERMIT TO INSTALL APPROVED: January 25, 2023	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 ₂ 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 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))	Installation Date / Modification Date	Flexible Group ID
EUMIXER1	Rubber mixer with associated rubber mill and cooling conveyor. Baghouse control.	7-13-1998 / 1-25-2023	FGMIXERS
EUMIXER2	Rubber mixer with associated rubber mill and cooling conveyor. Baghouse control.	7-13-1998	FGMIXERS
EULINE109	Rubber extrusion line with solvent bath	6-1-2017 / 1-25-2023	FGLINES, FGSOLVENT
EULINE103	Rubber extrusion line with solvent bath	5/29/98	FGLINES FGSOLVENT
EULINE107	Rubber extrusion line with solvent bath	5/29/98	FGLINES FGSOLVENT
EULINE148	Rubber extrusion line with solvent bath	5/29/98	FGLINES FGSOLVENT
EULINE151	Rubber extrusion line with solvent bath	5/29/98	FGLINES FGSOLVENT
EULINE152	Rubber extrusion line with solvent bath	5/29/98	FGLINES FGSOLVENT
EULINE153	Rubber extrusion line with solvent bath	5/29/98	FGLINES FGSOLVENT
EULINE154	Rubber extrusion line with solvent bath	5/26/98 3/9/11	FGLINES FGSOLVENT
EULINE161	Rubber extrusion line with solvent bath	10/2/02	FGLINES FGSOLVENT
EULINE167	Rubber extrusion line with solvent bath	5/29/98	FGLINES FGSOLVENT

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.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGSOLVENT	Solvent baths used on the extrusion lines	EULINE103, EULINE107, EULINE148, EULINE151, EULINE152, EULINE153, EULINE154, EULINE161, EULINE167, EULINE109
FGMIXERS	Two rubber mixers at Plant 1 each with an associated rubber mill, cooling conveyor, and baghouse control.	EUMIXER1, EUMIXER2

FGSOLVENT FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Solvent baths used on the extrusion lines

Emission Unit: EULINE103, EULINE107, EULINE148, EULINE151, EULINE152, EULINE153, EULINE154, EULINE161, EULINE167, EULINE109

POLLUTION CONTROL EQUIPMENT

Catalytic Oxidizer controlling emissions from the surface preparation/adhesion promoter applicators.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Toluene	19.6 tpy	12-month rolling time period as determined at the end of each calendar month	FGSOLVENT	SC VI.2	R 336.1205(1)(a), R 336.1225, R 336.1702(a)
2. Cyclohexanone	4.1 tpy	12-month rolling time period as determined at the end of each calendar month	FGSOLVENT	SC VI.2	R 336.1205(1)(a), R 336.1225, R 336.1702(a)

II. MATERIAL LIMIT(S)

1. The permittee shall only use toluene and cyclohexanone in FGSOLVENT for adhesion promoters/solvents. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the surface preparation adhesion promoter/solvent applicator portions of FGSOLVENT unless the catalytic oxidizer is installed, maintained and operated in a satisfactory manner. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a))**
2. Satisfactory operation of the catalytic oxidizer includes a minimum VOC destruction efficiency of 95 percent (by weight), a minimum catalyst bed inlet temperature of 650°F, and a maximum space velocity of 15,000 inverse hours. **(R 336.1205(1)(a), R 336.1225, R 336.1702, R 336.1910)**
3. The permittee shall not operate the catalytic oxidizer unless the continuous temperature monitoring and recording system is installed and operating properly. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device at the inlet to the catalyst bed of the catalytic oxidizer to monitor and record the inlet temperature on a continuous basis. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), 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 by the AQD District Supervisor, the permittee shall verify the VOC destruction efficiency of the catalytic oxidizer, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)**
2. Upon request by the AQD District Supervisor the permittee shall verify that the associated enclosure meets the definition of a PTE or verify the capture efficiency of the enclosure, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 51, Appendix M. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 336.1702(a), R 336.1910, R 336.2001, R 336.2003, R 336.2004)**
3. The permittee shall test and repair/replace the catalyst in the catalytic oxidizer as per manufacturer's recommendations. **(R 336.1205(1)(a), R 336.1225, R 336.1702(a), R 336.1910)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each adhesion promoter/solvent, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both. 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(a))**
2. The permittee shall maintain a monthly record, acceptable to the AQD District Supervisor, of the following information per emission unit for FGSOLVENT:
 - a. Daily hours of operation of FGSOLVENT when operating.
 - b. Pounds or gallons of each cyclohexanone and toluene adhesive used.
 - c. Cyclohexanone and toluene content, in weight percent or pounds per gallon, of each adhesive used.
 - d. Total (adhesive and rubber/plastic) toluene and cyclohexanone mass emission calculations determining monthly and annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month using the capture and destruction efficiency determined during the most recent stack test. **(R 336.1205(1)(a), R 336.1225, R 336.1901)**

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:

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-OXIDIZER	20	24	R 336.1225 40 CFR 52.21 (c)&(d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

**FGMIXERS
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION - Two rubber mixers at Plant 1 each with an associated rubber mill and cooling conveyor

Emission Units: EUMIXER1, EUMIXER2

POLLUTION CONTROL EQUIPMENT – Baghouse control

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.01 pounds per 1000 pounds of exhaust gases (dry gas basis)	Hourly	FGMIXERS	SC V.1, VI.2	R 336.1331
2. Particulate Matter	1.22 pounds per hour	Hourly	FGMIXERS	SC V.1, VI.2	R 336.1331
3. Particulate Matter	5.3 tpy	12-month rolling time period as determined at the end of each calendar month	FGMIXERS	SC V.1, VI.2	R 336.1331
4. VOC	2.2 pounds per hour	Hourly	FGMIXERS	SC VI.1,	R 336.1702(a)
5. VOC	4.9 tpy	12-month rolling time period as determined at the end of each calendar month	FGMIXERS	SC VI.1	R 336.1702(a)
6. Epichlorohydrin (ECO)	31 pounds per month ¹	Calendar Month	FGMIXERS	SC VI.1	R 336.1225

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate FGMIXERS unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 45 days of installation, 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 336.1225, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911)**

- 2. The permittee shall not operate the mixing process unless the dust collector and the intake ducts around the hopper entry points are installed and operating properly. **(R 336.1225, R 336.1331, R 336.1910)**
- 3. The permittee shall calibrate, maintain and operate differential pressure gauges on each mixer baghouse and monitor the differential pressure on a continuous basis. **(R 336.1225, R 336.1331, R 336.1910)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3))**

- 1. The permittee shall monitor and record, in a satisfactory manner, the following information for FGMIXERS:
 - a) Hours of operation of the mixing process.
 - b) The total pounds of each compound of rubber processed.
 - c) VOC emission calculations determining the total mass emissions from the mixing process in tons per month; and a 12-month rolling time period mass emission at the end of each calendar month using emission factors from the table in **Appendix A** or others as approved by the District Supervisor.
 - d) Particulate emission calculations determining the total mass emissions from the mixing process in tons per year at the end of each calendar month using emission factors acceptable to the District Supervisor.
 - e) The pounds of ECO emitted from the mixing process per month using emission factors from the table in **Appendix A** or others as approved by the district supervisor.
 - f) The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1331, R 336.1702)**
- 2. The permittee shall conduct and record monthly non-certified visible emissions observations for each of the mixer process baghouses. Observations must be conducted during operation of the process. If visible emissions are observed, the permittee shall also note the following in the record:
 - a) The cause of the visible emissions.
 - b) The total duration of the visible emission incident.
 - c) Corrective actions taken to eliminate the visible emissions.
 - d) The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1331, R 336.1910)**

3. The permittee shall record instances (alarms) when the differential pressure of the baghouse is outside the range identified in the malfunction abatement plan, as required by SC III.1. **(R 336.1225, R 336.1331, R 336.1910)**

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 EUMIXER1. **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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBAGHOUSE1	NA	12	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVBAGHOUSE2	NA	12	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVBAGHOUSE3	NA	10	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

APPENDIX A

VOC Emission Factors – for emission calculations associated with FGMIXERS (From Rubber Manufacturers' Association-dated 8-23-96):

Compound/ Compound Number	Emission Factor---Mixer Process lb/lb material processed	Emission Factor---Mill Process lb/lb material processed
EPDM #8	1.47E-05	2.14E-05
Neoprene #11	3.28E-05	4.79E-05
NBR #14	2.30E-04	3.35E-04
Hypalon #15	9.39E-06	1.37E-05
Fluoroelastomer #16	8.16E-05	1.19E-04
CPE #21	1.57E-04	2.28E-0
ECO #23	3.07E-05	4.47E-05