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**GENERAL PERMIT TO INSTALL FOR
A COATING LINE EMITTING UP TO 10 TONS PER YEAR OF
VOLATILE ORGANIC COMPOUNDS**

BACKGROUND

On September 18, 2000, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), issued a general permit to install for metal and/or plastic coating line(s) that emit up to ten (10) tons per year (TPY) of volatile organic compounds (VOCs). This general permit, issued pursuant to R 336.1201a promulgated pursuant to Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Rule 201a), provides a streamlined permitting alternative for affected facilities which meet the specified applicability criteria and allows facilities more operational flexibility. Prior to approval, EGLE held a 30-day public comment period to receive comments on the proposed general permit. A public hearing was not requested and EGLE received one written comment after the close of the comment period. The comment was reviewed by AQD staff and incorporated into the final version of the general permit.

This general permit was originally based on the coating categories listed in Part 6 of the Air Pollution Control Rules. Metal and plastic coating lines were the only categories that were not subject to a Part 6 emission standard at the levels allowed by the general permit. However, other substrates that did not have Part 6 standards but could meet the emission levels allowed by the general permit were overlooked. Therefore the general permit was revised to include coating lines emitting up to 10 TPY of VOCs for any substrate except cans, coils, large appliances, metal furniture, magnet wire, fabrics, paper, vinyl, flat wood paneling, or graphic arts lines.

For the purpose of this general permit to install, a coating line means an operation, which is a single series in a coating process and which is comprised of one or more coating applicators and any associated flash-off areas, drying areas, and ovens wherein one or more surface coatings are applied and subsequently dried or cured. Surface coating may include any paint, lacquer, varnish, adhesive, or other coating material applied on a surface. Surfaces include any substrate except cans, coils, large appliances, metal furniture, magnet wire, fabrics, paper, vinyl, flat wood paneling, or graphic arts lines.

The general permit to install may be used for one or more coating line, each emitting up to 10 TPY of VOCs. Emissions include VOCs from the coating line and all purge and clean-up operations associated with the line. This general permit includes recordkeeping requirements to demonstrate that annual VOC emissions from each coating line are less than 10 TPY and the combined VOC emissions from all coating lines at the stationary source (whether covered by a general permit, a permit to install issued pursuant to Rule 201, or exempt from the requirement to obtain a permit pursuant to Rule 287 and/or Rule 290) do not exceed 30 TPY.

The general permit for coating line(s) that emit up to 10 TPY of VOCs requires the following: use of High Volume Low Pressure (HVLP) spray applicators or equivalent technology with equal or better

transfer efficiency; the use of dry filters or a water curtain to control particulates; and minimum stack height(s) of one and one half times the building height (from ground level to point of discharge). The use of a properly operated thermal or catalytic oxidizer to meet the requirements of the general permit is also acceptable.

EMISSIONS

The allowed annual emission limits for this general permit are based on a 12-month rolling time period as determined at the end of each calendar month. The monthly emission limit is adequate as a short-term emission limit and is federally enforceable.

This general permit to install is not intended to be a synthetic minor permit for Hazardous Air Pollutants (HAPs). A coating line that is subject to a National Emission Standard for Hazardous Air Pollutants (NESHAP) or section 112(g) of the federal clean air act is not eligible to use this general permit to install and must obtain a New Source Review permit to install pursuant to Rule 201. A coating line subject to a NESHAP or section 112(g) is one that has the potential to emit 10 tons per year of any one HAP or 25 tons per year of all HAPs combined. In addition, a coating line subject to any New Source Performance Standard (NSPS) for surface coating is not eligible to use this general permit.

REVISIONS

The AQD may revise or update a general permit to install for various reasons, including administrative changes (i.e., addresses, contacts, formatting), clarifying instructions or permit language, or correcting an underlying applicable requirement. These types of minor changes are made without a comment period because they do not affect the applicability criteria or the special conditions of the general permit.

The general permit for coating lines emitting up to 10 tons per year of VOCs has been revised and/or updated as follows:

- March 20, 2002 – included coating lines for substrates other than metal and/or plastic.
- January 2002 and January 2003 - updated General Conditions and made minor administrative changes (i.e., addresses, formatting, etc.).
- December 2010 – changed format of the special conditions, revised conditions for operating and monitoring control equipment, and updated the General Information and Process Information forms (EQP5727 and EQP5759).
- June 2017 – made minor administrative changes to Background document.

If a change or revision will affect the applicability criteria or special conditions of the general permit, EGLE will hold a public comment period to receive comments on the proposed changes. If the applicability criteria or special conditions become less stringent as a result of the change (e.g., a setback requirement relaxed from 1000 feet to 500 feet; a reporting requirement reduced from daily to monthly), sources operating under an existing general permit will be notified of the change and allowed to operate under the revised criteria, which can be downloaded from the internet. A source operating under an existing general permit to install will not be required to meet the new requirements if the applicability criteria or special conditions become more stringent as a result of the change.

The most recent version of the general permit is available on the [AQD General Permit to Install web site](#). All changes to the general permit are summarized in the Background document.