# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

May 15, 2012

PERMIT TO INSTALL 292-98A

ISSUED TO Ford Motor Company

# LOCATED AT 1 American Drive

Dearborn, Michigan

IN THE COUNTY OF

Wayne

# STATE REGISTRATION NUMBER M4175

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. 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:

 March 20, 2012

 DATE PERMIT TO INSTALL APPROVED:
 SIGNATURE:

 May 15, 2012
 SIGNATURE:

 DATE PERMIT VOIDED:
 SIGNATURE:

 DATE PERMIT VOIDED:
 SIGNATURE:

 DATE PERMIT REVOKED:
 SIGNATURE:

# PERMIT TO INSTALL

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# **Common Abbreviations / Acronyms**

Common Acronyms			Pollutant/Measurement Abbreviations		
AQD	Air Quality Division	BTU	British Thermal Unit		
ANSI	American National Standards Institute	°C	Degrees Celsius		
BACT	Best Available Control Technology	со	Carbon Monoxide		
CAA	Clean Air Act	dscf	Dry standard cubic foot		
CEM	Continuous Emission Monitoring	dscm	Dry standard cubic meter		
CFR	Code of Federal Regulations	°F	Degrees Fahrenheit		
COM	Continuous Opacity Monitoring	gr	Grains		
EPA	Environmental Protection Agency	Hg	Mercury		
EU	Emission Unit	hr	Hour		
FG	Flexible Group	H <sub>2</sub> S	Hydrogen Sulfide		
GACS	Gallon of Applied Coating Solids	hp	Horsepower		
GC	General Condition	lb	Pound		
HAP	Hazardous Air Pollutant	m	Meter		
HVLP	High Volume Low Pressure *	mg	Milligram		
ID	Identification	mm	Millimeter		
LAER	Lowest Achievable Emission Rate	MM	Million		
MACT	Maximum Achievable Control Technology	MW	Megawatts		
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram		
MAP	Malfunction Abatement Plan	NOx	Oxides of Nitrogen		
MDEQ	Michigan Department of Environmental Quality (Department)	РМ	Particulate Matter		
MIOSHA	Michigan Occupational Safety & Health Administration	PM10	PM less than or equal to 10 microns diameter		
MSDS	Material Safety Data Sheet	PM2.5	PM less than or equal 2.5 microns diameter		
NESHAP	National Emission Standard for Hazardous Air Pollutants	pph	Pound per hour		
NSPS	New Source Performance Standards	ppm	Parts per million		
NSR	New Source Review	ppmv	Parts per million by volume		
PS	Performance Specification	ppmw	Parts per million by weight		
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute		
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge		
PTI	Permit to Install	scf	Standard cubic feet		
RACT	Reasonably Available Control Technology	sec	Seconds		
ROP	Renewable Operating Permit	SO <sub>2</sub>	Sulfur Dioxide		
SC	Special Condition	THC	Total Hydrocarbons		
SCR	Selective Catalytic Reduction	tpy	Tons per year		
SRN	State Registration Number	μg	Microgram		
TAC	Toxic Air Contaminant	VOC	Volatile Organic Compounds		
TEQ	Toxicity Equivalence Quotient	yr	Year		
VE	Visible Emissions	CO <sub>2</sub> e	Carbon dioxide equivalent		

\* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

#### GENERAL CONDITIONS

- 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 Environmental Quality, 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 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 R 336.1219 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 R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. (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, 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 R 336.1301, 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 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.
- 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 R 336.1370(2). (R 336.1370)
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. (R 336.2001)

#### 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 (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID		
EUBOILER1	Small industrial boiler	*	FGBOILERS		
EUBOILER2	Small industrial boiler	*	FGBOILERS		
EUBOILER3	Small industrial boiler	*	FGBOILERS		
EUBOILER4	Small industrial boiler	*	FGBOILERS		
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 336.1290.					

## 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
FGBOILERS	Four boilers. Primary fuel is natural gas. Backup fuel is fuel oil.	EUBOILER1 EUBOILER2 EUBOILER3 EUBOILER4
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	NA

#### The following conditions apply to: FGBOILERS

#### **DESCRIPTION:** Four boilers

Emission Units: EUBOILER1, EUBOILER2, EUBOILER3, EUBOILER4

#### POLLUTION CONTROL EQUIPMENT: NA

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. CO	5.7 lb per hour	Test protocol	FGBOILERS	SC V.1.	40 CFR 52.21(c) and (d) R 336.1804
2. NOx	9.6 lb per hour	Test protocol	FGBOILERS	SC V.1.	40 CFR 52.21(c) and (d) R 336.1803 R 336.1804
3. SO2	20.5 lb per hour	Test protocol	FGBOILERS	SC V.1.	40 CFR 52.21(c) and (d) R 336.1803 R 336.1804

#### II. MATERIAL LIMITS

NA

#### III. PROCESS/OPERATIONAL RESTRICTIONS

NA

#### IV. DESIGN/EQUIPMENT PARAMETERS

NA

#### V. TESTING/SAMPLING

Verification of CO, NOx and SO2 emission rates from FGBOILERS by testing at owner's expense, in accordance with Department requirements, may be required for operating approval. Verification of emission rates includes the submittal of a complete report of the test results. If a test is required, stack testing procedures and the location of stack testing ports must have prior approval by the District Supervisor, Air Quality Division, and results shall be submitted within 120 days of the written requirement for such verification. (R 336.1803, R 336.1804, 40 CFR 52.21(c) & (d))

## VI. MONITORING/RECORDKEEPING

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# VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

NA

# IX. OTHER REQUIREMENTS

# The following conditions apply Source-Wide to: FGFACILITY

# I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. CO	89 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.1. SC VI.4.	R 336.1205(3)
2. NOx	89 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.1. SC VI.4.	R 336.1205(3)
3. SO2	89 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.1. SC VI.4.	R 336.1205(3)
4. CO <sub>2</sub> e	78,000 tpy	12-month rolling time period as determined at the end of each calendar month.	FGFACILITY	SC VI.1. SC VI.4.	R 336.1205(3)

# II. MATERIAL LIMITS

- 1. When natural gas is the only fuel used in any 12-month period, the natural gas fuel usage for FGFACILITY shall not exceed 1,250 million cubic feet per year based on a 12-month rolling time period as determined at the end of the calendar month. (**R 336.1205(3)**)
- 2. When fuel oil is used in any 12-month period, the combined natural gas and fuel oil usage for FGFACILITY shall not exceed the following based on a 12-month rolling time period as determined at the end of each calendar month:
  - (a) 1,150 million cubic feet per year of natural gas
  - (b) 1 million gallons per year of fuel oil
  - (R 336.1205(3))

# III. PROCESS/OPERATIONAL RESTRICTIONS

1. The sulfur content of the fuel oil shall not exceed 0.30 weight percent. (R 336.1402)

# IV. DESIGN/EQUIPMENT PARAMETERS

NA

# V. TESTING/SAMPLING

#### **VI. MONITORING/RECORDKEEPING**

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

- 1. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period CO, NOx, SO2 and CO<sub>2</sub>e emission calculation records for FGFACILITY, as required by SC I.1, I.2., I.3., and I.4. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))
- 2. The permittee shall keep, in a satisfactory manner, records of the sulfur content of the fuel oil, as required by SC III.1. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))
- 3. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period total fuel-specific use records for FGFACILITY. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))
- 4. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available within 45 days of the end of each calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1205, R 336.1702(a), R 336.1901)

## VII. <u>REPORTING</u>

NA

# VIII. STACK/VENT RESTRICTIONS

NA

# IX. OTHER REQUIREMENTS