MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

March 21, 2012

PERMIT TO INSTALL 222-04A

ISSUED TO

Mueller Impacts Company, Inc.

LOCATED AT 2409 Wills Street Marysville, Michigan

IN THE COUNTY OF St. Clair

STATE REGISTRATION NUMBER N6905

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: February 21, 2012 | | | |
|---|------------|--|--|
| DATE PERMIT TO INSTALL APPROVED: March 21, 2012 | SIGNATURE: | | |
| DATE PERMIT VOIDED: | SIGNATURE: | | |
| DATE PERMIT REVOKED: | SIGNATURE: | | |

Common Abbreviations / Acronyms

| Common Acronyms | | | Pollutant / Measurement Abbreviations | | |
|--------------------------|--|-------------------------------|---------------------------------------|--|--|
| AQD Air Quality Division | | BTU | British Thermal Unit | | |
| BACT | Best Available Control Technology | °C | Degrees Celsius | | |
| CAA | Clean Air Act | СО | Carbon Monoxide | | |
| CEM | Continuous Emission Monitoring | dscf | Dry standard cubic foot | | |
| CFR | Code of Federal Regulations | dscm Dry standard cubic meter | | | |
| CO ₂ e | Carbon Dioxide Equivalent | °F | Degrees Fahrenheit | | |
| COM | Continuous Opacity Monitoring | gr | Grains | | |
| EPA | Environmental Protection Agency | Hg | Mercury | | |
| EU | Emission Unit | hr | Hour | | |
| FG | Flexible Group | H ₂ S | Hydrogen Sulfide | | |
| GACS | Gallon of Applied Coating Solids | hp | Horsepower | | |
| GC | General Condition | lb | Pound | | |
| GHGs | Greenhouse Gases | kW | Kilowatt | | |
| 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 | NO _x | Oxides of Nitrogen | | |
| MDEQ | Michigan Department of Environmental Quality (Department) | PM | Particulate Matter | | |
| MSDS | Material Safety Data Sheet | PM10 | PM less than 10 microns diameter | | |
| NESHAP | National Emission Standard for Hazardous Air Pollutants | PM2.5 | PM less than 2.5 microns diameter | | |
| NSPS | New Source Performance Standards | pph | Pounds per hour | | |
| NSR | New Source Review | ppm | Parts per million | | |
| PS | Performance Specification | ppmv | Parts per million by volume | | |
| PSD | Prevention of Significant Deterioration | ppmw | Parts per million by weight | | |
| PTE | Permanent Total Enclosure | psia | Pounds per square inch absolute | | |
| PTI | Permit to Install | psig | Pounds per square inch gauge | | |
| RACT | Reasonably Available Control Technology | scf | Standard cubic feet | | |
| ROP | Renewable Operating Permit | sec | Seconds | | |
| SC | Special Condition | SO ₂ | Sulfur Dioxide | | |
| SCR | Selective Catalytic Reduction | THC | Total Hydrocarbons | | |
| SRN | State Registration Number | tpy | Tons per year | | |
| TAC | Toxic Air Contaminant | μg | Microgram | | |
| TEQ | Toxicity Equivalence Quotient | VOC | Volatile Organic Compound | | |
| VE | Visible Emissions | yr | Year | | |

^{*} 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

- 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 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 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.
- 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.
- 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 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) | Flexible Group ID | |
|---|--|-------------------|--|
| | Continuous blast booth for aluminum parts. Emissions are controlled by a wet scrubber. | 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 336.1290.

The following conditions apply to: EUBLASTBOOTH

DESCRIPTION: Continuous blast booth for aluminum parts

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Wet scrubber

I. EMISSION LIMITS

| Pollutant | Limit | Time Period / Operating Scenario | Equipment | Testing / Monitoring Method | Underlying Applicable Requirements |
|-----------|---|-------------------------------------|--------------|-----------------------------------|--|
| 1. PM | 0.05 lbs per 1000 lbs of exhaust gas ^a | Test Protocol* | EUBLASTBOOTH | GC 13 | R 336.1331 |
| 2. PM10 | 0.7 pph | Test Protocol* | EUBLASTBOOTH | GC 13 | R 336.2803, R 336.2804, 40 CFR 52.21 Subparts (c) & (d) |
| 3. PM2.5 | 0.7 pph | Test Protocol* | EUBLASTBOOTH | GC 13 | R 336.2803, R 336.2804, 40 CFR 52.21 Subparts (c) & (d) |

^a Calculated on a wet gas basis

II. MATERIAL LIMITS

^{*} Test protocol shall specify averaging time

^{4.} Visible emissions from EUBLASTBOOTH shall not exceed a six-minute average of 10 percent opacity. (R 336.1301, R 336.1331, 40 CFR 52.21)

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not operate EUBLASTBOOTH unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the wet scrubber, has been submitted within 90 days of permit issuance, 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 guick 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 336.1331, R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee shall not operate EUBLASTBOOTH unless the wet scrubber is installed, maintained, and operated in a satisfactory manner. (R 336.1331, R 336.1901, R 336.1910)
- 2. The permittee shall equip and maintain the EUBLASTBOOTH wet scrubber with a liquid flow indicator. (R 336.1301, R 336.1301, R 336.1901, R 336.1910)

V. TESTING/SAMPLING

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

NA

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 and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1331, R 336.1901, R 336.1910)
- 2. The permittee shall monitor and record that liquid flow is present in the EUBLASTBOOTH wet scrubber once per shift, while in operation. (R 336.1301, R 336.1331, R 336.1901, R 336.1910)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

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. SVBLASTBOOTH | 12 | 20 | R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d) |

IX. OTHER REQUIREMENTS

NA

 $\frac{\textbf{Footnotes}:}{^{1}\textbf{This condition is state only enforceable and was established pursuant to Rule 201(1)(b)}.$