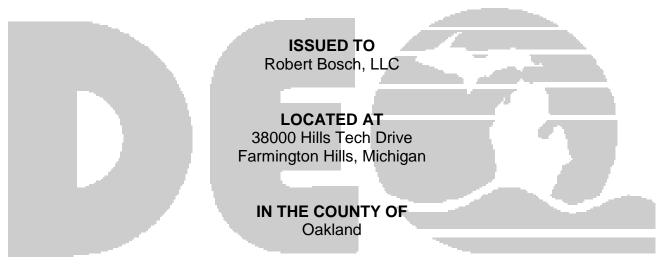
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

July 25, 2007 REVISED September 14, 2007

PERMIT TO INSTALL

259-05A



STATE REGISTRATION NUMBER N5582

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:

 May 31, 2007

 DATE PERMIT TO INSTALL APPROVED:
 SIGNATURE:

 July 25, 2007
 SIGNATURE:

 DATE PERMIT VOIDED:
 SIGNATURE:

 DATE PERMIT REVOKED:
 SIGNATURE:

PERMIT TO INSTALL

Table of Contents

Section	Page
Alphabetical Listing of Common Abbreviations / Acronyms	2
General Conditions	3
Emission Unit Identification	5
Flexible Group Identification	5
NSPS Dc Emission Unit Special Conditions	6
Controlled Dynamometer Flexible Group Special Conditions	6
Uncontrolled Dynamometer Flexible Group Special Conditions	6
Facility Flexible Group Special Conditions	6

Common	Abbreviations	/ Acronyms
--------	----------------------	------------

	Common Acronyms	P	ollutant/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_2S	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	РМ	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM-10	Particulate Matter less than 10 microns diameter
MSDS	Material Safety Data Sheet	pph	Pound per hour
NESHAP	National Emission Standard for Hazardous Air Pollutants	ppm	Parts per million
NSPS	New Source Performance Standards	ppmv	Parts per million by volume
NSR	New Source Review	ppmw	Parts per million by weight
PS	Performance Specification	psia	Pounds per square inch absolute
PSD	Prevention of Significant Deterioration	psig	Pounds per square inch gauge
PTE	Permanent Total Enclosure	scf	Standard cubic feet
PTI	Permit to Install	sec	Seconds
RACT	Reasonably Available Control Technology	SO ₂	Sulfur Dioxide
ROP	Renewable Operating Permit	THC	Total Hydrocarbons
SC	Special Condition	tpy	Tons per year
SCR	Selective Catalytic Reduction	μg	Microgram
SRN	State Registration Number	VOC	Volatile Organic Compounds
TAC	Toxic Air Contaminant	yr	Year
TEQ	Toxicity Equivalence Quotient		
VE	Visible Emissions		

* 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, 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 AQD District Supervisor shall be notified, in writing, of a change in ownership or operational control of the stationary source or emission unit(s) authorized by this Permit to Install pursuant to R 336.1219. The notification shall include all of the information required by R 336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R 336.1219(1)(c), agreeing to and accepting the terms and conditions of this Permit to Install, and shall notify the AQD District Supervisor of any change in the contact person for this Permit to Install. (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 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 nor does it affect any liability for past violations under the Natural Resources and Environmental Protection Act, 1994 PA 451.
- 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 Identification

Emission Unit ID	Emission Unit Description	Permit Exemption	
EU-113BoilPK	Penthouse – Kewanee 10.5 mmBtu/hr natural gas boiler.	R336.1282(b)(i)	
EU-105BoilK	Kewanee 10.5 mmBtu/hr natural gas boiler.	R336.1282(b)(i)	
Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 through R336.1290.			

Flexible Group Identification

Flexible Group ID	Emission Units Included in Flexible Group	Stack Identification
FG-EngDynNCgas	Gasoline/Indolene Engine Dynamometers with no CO controls that are exempt from the requirements of R336.1201, and any	NA
	such emission units meeting these requirements added in the future.	
FG-EngDynCCgas	Gasoline/Indolene Engine Dynamometers with catalytic converter CO controls that are exempt from the requirements of R336.1201 and any such emission units meeting these requirements added in the future.	NA
FG-Boiler	Any natural gas-fired boilers considered part of the stationary source that are exempt from the requirements of R336.1201, and any such emission units meeting these requirements added in the future.	NA
FG-Diesel	Any diesel fuel-fired equipment considered part of the stationary source that are exempt from the requirements of R336.1201, and any such emission units meeting these requirements added in the future.	NA
FG-FACILITY	All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.	NA
	nt described in this table are subject to the require 36.1278 through R336.1290.	ments of R336.1201,

The following conditions apply to: EU-113BOILPK and EU-105BOILK

Recordkeeping/Reporting/Notification

- 1.1 The permittee shall submit notification of the date of construction and actual startup of EU-113BOILPK and EU-105BOILK. The notification shall include the design heat input capacity of EU-113BOILPK and EU-105BOILK, the identification of the fuels to be combusted and the annual capacity factor at which the boilers are anticipated to operate. **[40 CFR 60.48c(a)]**
- 1.2 The permittee shall keep, in a satisfactory manner, monthly natural gas usage records for EU-113BOILPK and EU-105BOILK. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[40 CFR 60.48c(g)]**

The following conditions apply to: FG-EngDynCCgas

Equipment

2.1 The permittee shall not operate FG-EngDynCCgas unless the associated catalytic converter is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the catalytic converter includes a minimum CO destruction efficiency of 96 percent (by weight). [R336.1205, R336.1910]

The following conditions apply to: FG-EngDynNCgas

Material Usage Limits

3.1 The combined gasoline/indolene usage for FG-EngDynNCgas shall not exceed 41,000 gallons per 12-month rolling time period as determined at the end of each calendar month. **[R336.1205]**

The following conditions apply to: FG-FACILITY

Emission Limits

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirement(s)
4.1	CO	FG-FACILITY	Less than 90 tpy	12-month rolling time period as determined at the end of each calendar month.	SC 4.2, SC 4.3	R336.1205

Recordkeeping/Reporting/Notification

4.2 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 recordkeeping, reporting or notification special condition. **[R336.1205]**

- 4.3 The permittee shall keep the following information on a calendar month basis for FG-FACILITY:
 - a. Monthly gasoline and indolene usage for each emission unit in FG-EngDynNCgas and FG-EngDynCCgas.
 - b. Total monthly diesel fuel usage for FG-Diesel and total monthly natural gas usage for FG-Boiler.
 - c. The following CO emission factors shall be applied for determining actual uncontrolled emissions unless a revised emission factor(s) have been approved in writing by the AQD District Supervisor:

Flexible Group or Emission Unit(s)	CO Emission Factor*
FG-EngDynCCgas and FG- EngDynNCgas	3,940 lbs/kgal gasoline/indolene
FG-Boiler	84 lbs/MMscf natural gas
FG-Diesel	130 lbs/kgal diesel
*kgal is defined as 1000 gallons cubic feet.	and MMscf is defined as million standard

- d. A CO destruction efficiency of 96 percent (by weight) shall be applied for each of the catalytic converters when calculating emissions from FG-EngDynCCgas.
- e. Requests for revised engine emission factors shall be submitted to the District Supervisor in writing and shall consist of a proposal to use a USEPA, AP-42 emission factor or an emission factor developed from on-site monitoring. No less than 30 days prior to the on-site monitoring, the permittee shall submit a complete monitoring plan to the AQD. The AQD must approve the final plan prior to the monitoring. Determination of emission factors includes the submittal of a complete report of the monitoring results to the AQD within 60 days following the last date of the monitoring.
- f. CO mass emission calculations based on fuel usage, CO emission factor, and CO control efficiency information determining the monthly and 12-month rolling time period CO emission rate.

The permittee shall keep the records in a format and using calculation methods that have been approved by the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request. **[R336.1205]**