# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

July 19, 2007

# **PERMIT TO INSTALL**

176-07

## **ISSUED TO**

Federal Mogul Corporation

#### **LOCATED AT**

510 East Grove Street Greenville, Michigan

# IN THE COUNTY OF

Montcalm

# STATE REGISTRATION NUMBER

B7288

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).

July 11, 2007				
July 19, 2007	SIGNATURE:			
DATE PERMIT VOIDED:	SIGNATURE:			
DATE PERMIT REVOKED:	SIGNATURE:			

# PERMIT TO INSTALL

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# **Common Abbreviations / Acronyms**

Common Acronyms			collutant/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
СОМ	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	PM	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 <sub>2</sub>	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		

<sup>\*</sup> 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 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 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**

<b>Emission Unit ID</b>	Emission Unit Description	Stack Identification
EU-BABBITTLINE	The Babbitt operation consists of melting and casting of alloy on steel strip. Emissions from the operation are controlled by a ductwork and hood system and a lime-injected Torrit cartridge collector.	SV316
EU-BABBITBRUSH  The wire brushing operation of alloy on steel strip controlled by an Aget baghouse.		SV315
The skiving and milling operations of alloy on steel strip controlled by a Forrest Brothers baghouse.		SV314
EU-OVEN	A natural gas-fired annealing oven with a heat input of 1.5 MMBtu/hr. No control	SV313

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: EU-BABBITTLINE

#### **Emission Limits**

	Pollutant	Limit	Time Period	Equipment	Testing/ Monitoring Method	Applicable Requirement
1.1a	PM-10	1.3 lbs/hr	Test Protocol	EU-BABBITTLINE	GC 13	R 336.1205
1.1b	PM-10	0.01 gr/dscf	Test Protocol	EU-BABBITTLINE	GC 13	R 336.1205
1.1c	HCI	0.03 pph	Test Protocol	EU-BABBITTLINE	GC 13	R 336.1224

#### Equipment

- 1.2 The permittee shall equip and maintain EU-BABBITTLINE with a lime injected cartridge collector with a pressure drop indicator. (R 336.1205, R 336.1220, R 336.1224, R 336.1225, R 336.1901)
- 1.3 The permittee shall not operate EU-BABBITTLINE unless the lime injected cartridge collector is installed, maintained, and operated according to the preventative maintenance plan approved by the Air Quality District Supervisor. At a minimum, this plan shall contain the procedures for the proper operation of the cartridge collector and the lime injection system and a maintenance schedule consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910)

#### Recordkeeping/Reporting/Notification

1.4 A written record of the daily lime usage rate, pressure drop measurement, and automatic cleaning frequency in the lime-injected cartridge collector shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request. (R 336.1331, R 336.1224)

#### **Stack/Vent Restrictions**

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
1.5	SV316	40	40	R 3336.12803, R 336.12804, 40 CFR 52.21 (c) and (d)

## The following conditions apply to: EU-BABBITTBRUSH

#### **Emission Limits**

	Pollutant	Limit	Time Period	Equipment	Testing/ Monitoring Method	Applicable Requirement
2.1a	PM-10	0.1 lbs/hr	Test Protocol	EU- BABBITTBRUSH	GC 13	R 336.1205
2.1b	PM-10	0.01 gr/dscf	Test Protocol	EU- BABBITTBRUSH	GC 13	R 336.1205

## **Equipment**

- 2.2 The permittee shall equip and maintain EU-BABBITTBRUSH with a baghouse with a pressure drop indicator. (R 336.1205, R 336.1220, R 336.1224, R 336.1225, R 336.1901)
- 2.3 The permittee shall not operate EU-BABBITTBRUSH unless the baghouse is installed, maintained, and operated according to the preventative maintenance plan approved by the Air Quality District Supervisor. At a minimum, this plan shall contain the procedures for the proper operation of the baghouse and a maintenance schedule consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910)

#### Recordkeeping/Reporting/Notification

2.4 A written record of the daily pressure drop measurement and automatic cleaning frequency in the baghouse shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request. (R 336.1331, R 336.1224)

#### **Stack/Vent Restrictions**

	Stack & Vent ID	Maximum	Minimum Height Above	Applicable
		Diameter (inches)	Ground Level (feet)	Requirement
2.5	SV315	8	40	R 3336.12803,
				R 336.12804,
				40 CFR 52.21 (c)
				and (d)

# The following conditions apply to: EU-BABBITTCHIP

#### **Emission Limits**

	Pollutant	Limit	Time Period	Equipment	Testing/ Monitoring Method	Applicable Requirement
3.1a	PM-10	0.2 lbs/hr	Test Protocol	EU-BABBITTCHIP	GC 13	R 336.1205
3.1b	PM-10	0.01 gr/dscf	Test Protocol	EU-BABBITTCHIP	GC 13	R 336.1205

## **Equipment**

- 3.2 The permittee shall equip and maintain EU-BABBITTCHIP with a baghouse with a pressure drop indicator. (R 336.1205, R 336.1220, R 336.1224, R 336.1225, R 336.1901)
- 3.3 The permittee shall not operate EU-BABBITTCHIP unless the baghouse is installed, maintained, and operated according to the preventative maintenance plan approved by the Air Quality District Supervisor. At a minimum, this plan shall contain the procedures for the proper operation of the baghouse and a maintenance schedule consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance. (R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910)

## Recordkeeping/Reporting/Notification

3.4 A written record of the pressure drop measurement and automatic cleaning frequency in the baghouse shall be kept on file for a period of at least five years and made available to the Air Quality Division upon request. (R 336.1331, R 336.1224)

#### Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
3.5	SV314	10.5 x 9.5	40	R 3336.12803, R 336.12804, 40 CFR 52.21 (c) and (d)

#### The following conditions apply to: EU-OVEN

#### Stack/Vent Restrictions

	Stack & Vent ID	Maximum	Minimum Height Above	Applicable
	Stack & Vent ID	Diameter (inches)	Ground Level (feet)	Requirement
				R 3336.12803,
4.1	SV313	12	30	R 336.12804,
			30	40 CFR 52.21 (c)
				and (d)