MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT AIR QUALITY DIVISION

April 19, 2010

PERMIT TO INSTALL No. 239-09

ISSUED TO Process Prototype, Inc.

LOCATED AT

27850 Wick Road Romulus, Michigan 48174

IN THE COUNTY OF Wayne

STATE REGISTRATION NUMBER M4387

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Natural Resources and Environment. 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 15, 2010

DATE PERMIT TO INSTALL APPROVED: April 19, 2010	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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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 ₂ 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
MDNRE	Michigan Department of Natural Resources and Environment (Department)	РМ	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM10	PM less than 10 microns diameter
MSDS	Material Safety Data Sheet	PM2.5	PM less than 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 ₂	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		

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

- 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 Natural Resources and Environment, 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 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 Natural Resources and Environment. (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)	Flexible Group ID		
EUIRONFURNACES	Four electric induction furnaces with a total capacity of 2,300 lbs.	FGFACILITY		
EUALFURNACES	One electric aluminum melting furnace with a 2,000-lb capacity and one gas-fired melting furnace with a 600-lb capacity.	FGFACILITY		
EUMOLD/CORE	The mold/core making process equipped with mixer, sand reclaimer, core oven, 3 gassers with an acid scrubber.	FGFACILITY		
EUFINISHING	The finishing process equipped with grinders, shot blasters, and associated devices.	FGFACILITY		
EUTHERMSANDREC	Thermal sand reclaimer, model # PX500, equipped with 4,600 cfm Torit dust collector.	FGFACILITY		
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: EUIRONFURNACES

DESCRIPTION: Four electric induction furnaces (two 650-lb capacity furnaces and two 500-lb capacity furnaces)

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.1 lb/1,000 lb gas, calculated on a dry gas basis		EUIRONFURNACES	GC 13	R 136.1331

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Iron Throughput (Melted)	500 tpy	12-month rolling time period	EUIRONFURNACES	VI	R 136.1205 (3)

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

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 iron throughput (melted) records for EUIRONFURNACES, as required by Condition II.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205(3))**

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EUALNFURNACES

DESCRIPTION: One electric aluminum melting furnace with a 2,000-lb capacity and one gas-fired melting furnace with a 600-lb capacity.

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.1 lb/1,000 lb gas, calculated on a dry gas basis		EUALFURNACES	GC 13	R 136.1331

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Aluminum Throughput (Melted)	100 tpy	12-month rolling time period	EUALFURNACES	VI	R 136.1205 (3)

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not melt in EUALFURNACES any material other than clean charge (virgin aluminum), customer returns, or internal scrap, as defined by 40 CFR Part 63 Subpart RRR. This condition is necessary to avoid requirements of 40 CFR Part 63 Subpart RRR, National Emission Standards for Secondary Aluminum Production. (R 336.1224 and R 336.1225, 40 CFR Part 63 Subpart RRR)

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

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 aluminum throughput (melted) records for EUALFURNACES, as required by Condition II.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205(3))

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EUMOLD/CORE

DESCRIPTION: The mold/core making process equipped with mixer, core oven, 3 gassers with an acid scrubber.

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Dimethylisopropylamine (DMIPA)	225 gallons/yr	12-month rolling time period	EUMOLD/CORE	VI	R 136.1225

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not use triethylamine in EUMOLD/CORE. (R 136.1225)

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate any gasser of EUMOLD/CORE unless the scrubber is installed, maintained, and operated in a satisfactory manner. (R 336.1901, R 336.1910)

V. TESTING/SAMPLING

NA

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 DMIPA usage records for EUMOLD/CORE, as required by Condition II.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1205(3))

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EUTHERMSANDREC

DESCRIPTION: The sand reclaiming process equipped with a 3,600cfm Torit dust collector.

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: Torit dust collector, Model # TD4600

I. EMISSION LIMITS

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
,	1. PM	0.01 lb/1,000 lb gas, calculated on a dry gas basis	Test Protocol	EUTHERMSANDREC	GC 13	R 136.1331

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUTHERMSANDREC unless the associated dust collector is installed, maintained, and operated in a satisfactory manner. (R 336.1331, R 336.1910)

V. TESTING/SAMPLING

VI. MONITORING/RECORDKEEPING

NA

VII. <u>REPORTING</u>

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. SVTHERMSANDREC	12	30	R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d)

IX. OTHER REQUIREMENTS

NA

The following conditions apply to: EUFINISHING

DESCRIPTION: The finishing process equipped with grinders, shot blasters, and associated devices

Flexible Group ID: FGFACILITY

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate EUFINISHING unless the associated dust collectors are installed, maintained, and operated in a satisfactory manner. (R 336.1331, R 336.1910)

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

NA

VII. <u>REPORTING</u>

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA

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
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.	EUIRONFURNACES, EUALFURNACES, EUMOLD/CORE, EUFINISHING, and EUTHERMSANDREC

The following conditions apply Source-Wide to: FGFACILITY

POLLUTION CONTROL EQUIPMENT:

I. EMISSION LIMITS

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. If processing metallic scrap, the permittee shall implement and maintain a plan to address the pollution prevention management practices for metallic scrap and mercury switches by the applicable compliance date (February 1, 2009) specified in 40 CFR 63.10881. The plan shall include the following:
 - a. Metallic scrap management program. (40 CFR 63.10885(a))
 - b. Mercury requirements. (40 CFR 63.10885(b))

The permittee shall revise the plan within 30 days after a change occurs. (§63.10885 of 40 CFR Part 63, Subpart ZZZZ)

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

- The permittee shall keep records to document use of any binder chemical formulation that does not contain methanol as a specific ingredient of the catalyst formulation for each furfuryl alcohol warm box mold or core making line as required by §63.10886. These records must be the Material Safety Data Sheet (provided that it contains appropriate information), a certified product data sheet, or a manufacturer's hazardous air pollutant data sheet. (§ 63.10890 of 40 CFR Part 63 Subpart ZZZZZ)
- 2. The permittee shall keep records of the annual quantity and composition of each Hazardous Air Pollutantcontaining chemical binder or coating material used to make molds and cores. These records must be copies of purchasing records, Material Safety Data Sheets, or other documentation that provide information on the binder or coating materials used. (§ 63.10890 of 40 CFR Part 63 Subpart ZZZZ)
- 3. The permittee shall keep records of the metal melt production for each calendar year. (§ 63.10890 of 40 CFR Part 63 Subpart ZZZZ)
- 4. The permittee shall keep records of emission information and operating and maintenance information to comply with the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and ZZZZZ. The permittee shall keep all source emissions and operating and maintenance information on file AT THE FACILITY for a period of at least five years and make them available to the Department upon request. (40 CFR Part 63 Subparts A & ZZZZZ)

VII. <u>REPORTING</u>

 The permittee shall submit and keep a copy of an initial notification, notification of size classification, notifications of compliance status, and semi-annual certification reports as specified in 40 CFR 63.10890. (40 CFR 63, Subpart ZZZZ)

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS