

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

January 25, 2012

**PERMIT TO INSTALL  
188-11**

**ISSUED TO  
Huron Valley Steel**

**LOCATED AT  
41000 Huron River Drive  
Belleville, Michigan**

**IN THE COUNTY OF  
Wayne**

**STATE REGISTRATION NUMBER  
B6178**

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:

**January 12, 2012**

DATE PERMIT TO INSTALL APPROVED:

**January 23, 2012**

SIGNATURE:

DATE PERMIT VOIDED:

SIGNATURE:

DATE PERMIT REVOKED:

SIGNATURE:

**PERMIT TO INSTALL**

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**Common Abbreviations / Acronyms**

| <b>Common Acronyms</b> |   | <b>Pollutant/Measurement Abbreviations</b> |  |
|------------------------|---|--|--|
| AQD                    | Air Quality Division  | Btu  | British Thermal Unit                                     |
| ANSI                   | American National Standards Institute                             | °C   | Degrees Celsius  |
| BACT                   | Best Available Control Technology                                 | CO   | 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  | NO <sub>x</sub>                            | Oxides of nitrogen                                       |
| MDEQ                   | Michigan Department of Environmental Quality (Department)         | PM   | Particulate matter                                       |
| MIOSHA                 | Michigan Occupational Safety & Health Administration (Department) | PM10                                       | PM less than or equal to 10 microns aerodynamic 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 <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   |  |  |

\* 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.
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.
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.

| <b>Emission Unit ID</b>  | <b>Emission Unit Description<br/>(Process Equipment &amp; Control Devices)</b>   | <b>Installation Date /<br/>Modification Date</b> | <b>Flexible Group ID</b> |
|--|--|--|--------------------------|
| EU_PREPLINE  | Scrap aluminum separation process. Capacity 240,000 tpy. Consists of conveyor screens, eddy current separation, and two (2) cyclones. System runs on electricity, no combustion on-site. Output will be approximately 24,000 tpy of high grade aluminum. | January 25, 2012                                 | 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: EU PREPLINE**

**DESCRIPTION:** Scrap aluminum separation process. Capacity is 240,000 TPY. Consists of conveyor screens, eddy current separation, and two (2) cyclones. System runs on electricity, no combustion on-site. Output will be approximately 24,000 TPY of high grade aluminum.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT:** NA

**I. EMISSION LIMITS**

1. Visible emissions from all equipment and transfer points within EU\_PREPLINE shall not exceed a six-minute average of 10 percent opacity. **(R 336.1301)**

**II. MATERIAL LIMITS**

1. The permittee shall not process more than 240,000 tons of material through EU\_PREPLINE per 12-month rolling time period as determined at the end of each calendar month. **(R 336. 1201(3), R 336.1901)**

**III. PROCESS/OPERATIONAL RESTRICTIONS** NA

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate EU\_PREPLINE unless the external conveyor hoods are installed, maintained and operated in a satisfactory manner, approvable by the AQD District Supervisor. **(R 336.1301, R 336.1901)**
2. The drop distance at each transfer point of EU\_PREPLINE shall be reduced to the minimum the equipment can achieve. **(R 336.1372, R 336.1901)**
3. Each transfer point and storage area of EU\_PREPLINE shall be designed to control potential dust problems and shall be watered on an as needed basis in order to meet an opacity limit of ten percent. Equipment to apply water or dust suppressant shall be available at the site, or on call for use at the site, within a given operating day. **(R 336.1372, R 336.1901)**

**V. TESTING/SAMPLING**

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

1. The permittee shall perform and document non-certified visible emissions observations on a daily basis at all transfer points when EU\_PREPLINE is operating. If during the observation there are any visible emissions detected from an emission point, an EPA Method 22 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, EPA Method 22 observations that are performed, the reason for any visible emissions observed and any corrective actions taken shall be kept on file and in a format acceptable to the AQD. **(R 336.1301, R 336.1901)**

**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, a log of the amount of material processed through EU\_PREPLINE in tons per month and tons per 12-month rolling time period. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336. 1201(3), R 336.1901)**
2. The permittee shall keep, in a satisfactory manner, records of all daily visible emission readings for EU\_PREPLINE as required in SC V.1. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, and status of visible emissions. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301)**
3. The permittee shall keep, in a satisfactory manner, records of all dust control watering of EU\_PREPLINE as required in SC IV.3. At a minimum, records shall include the date, time, and duration of needed watering activities. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301)**

**VII. REPORTING NA**

**VIII. STACK/VENT RESTRICTIONS NA**

**IX. OTHER REQUIREMENTS NA**

**Footnotes:**

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).