MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

August 3, 2015

PERMIT TO INSTALL 124-15

ISSUED TOWyman-Gordon Company

Tocated AT
7250 Whitmore Lake Road
Brighton, Michigan

IN THE COUNTY OF Livingston

RIS PENINSUL

STATE REGISTRATION NUMBER B8642

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 23, 2015	REQUIRED BY RULE 203:
DATE PERMIT TO INSTALL APPROVED: August 3, 2015	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
Special Conditions	5
Emission Unit Summary Table	5
Special Conditions for EUATOMIZER2	6
Special Conditions for EUEVAPORATOR	9

Common Abbreviations / Acronyms

Common Abbrevia			Pollutant / Measurement Abbreviations		
AQD	Air Quality Division	acfm Actual cubic feet per minute			
BACT	Best Available Control Technology	BTU	British Thermal Unit		
CAA	Clean Air Act	°C	Degrees Celsius		
CAM	Compliance Assurance Monitoring	co	Carbon Monoxide		
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent		
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot		
СОМ	Continuous Opacity Monitoring	dscm	Dry standard cubic meter		
Department/	Michigan Department of Environmental	°F	Degrees Fahrenheit		
department	Quality	gr	Grains		
EU	Emission Unit	HAP	Hazardous Air Pollutant		
FG	Flexible Group	Hg	Mercury		
GACS	Gallons of Applied Coating Solids	hr	Hour		
GC	General Condition	HP	Horsepower		
GHGs	Greenhouse Gases	H ₂ S	Hydrogen Sulfide		
HVLP	High Volume Low Pressure*	kW	Kilowatt		
ID	Identification	lb	Pound		
IRSL	Initial Risk Screening Level	m	Meter		
ITSL	Initial Threshold Screening Level	mg	Milligram		
LAER	Lowest Achievable Emission Rate	mm	Millimeter		
MACT	Maximum Achievable Control Technology	MM	Million		
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts		
MAP	Malfunction Abatement Plan	NMOC	Non-methane Organic Compounds		
MDEQ	Michigan Department of Environmental	NO _x	Oxides of Nitrogen		
MODO	Quality Makarial Cafata Bata Chapt	ng	Nanogram Parity Island		
MSDS NA	Material Safety Data Sheet Not Applicable	PM	Particulate Matter		
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter		
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in 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	Reasonable Available Control Technology	scf	Standard cubic feet		
ROP	Renewable Operating Permit	sec	Seconds		
SC	Special Condition	SO ₂	Sulfur Dioxide		
SCR	Selective Catalytic Reduction	TAC	Toxic Air Contaminant		
SNCR	Selective Non-Catalytic Reduction	Temp	Temperature		
SRN	State Registration Number	THC	Total Hydrocarbons		
TEQ	Toxicity Equivalence Quotient	tpy	Tons per year		
USEPA/EPA	United States Environmental Protection	μg	Microgram		
	Agency	μm	Micrometer or Micron		
VE	Visible Emissions	VOC	Volatile Organic Compounds		
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^{*}For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 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
EUATOMIZER2	Gas atomizer unit for converting nickel based alloys from ingot into powder using argon gas atomization. The process argon gas and residual powder are exhausted to a cyclone dust collector to collect the metal powder. The atomizer is controlled by a baghouse.	NA
EUEVAPORATOR	Waste water evaporator system.	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: EUATOMIZER2

<u>DESCRIPTION</u>: Gas atomizer unit for converting nickel based alloys from ingot into powder using argon gas atomization.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Baghouse

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not operate EUATOMIZER2 unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the baghouse, has been submitted within 60 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 quick 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 336.1225, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) and (d))

IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee shall not operate EUATOMIZER2 unless the baghouse is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes but is not limited to maintaining and operating the baghouse as specified by the manufacturer. The ranges of the parameters required to be monitored by the manufacturer shall be specified in the MAP, as required by SC III.1. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))
- 2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor and record the pressure drop across baghouse for EUATOMIZER2 on a continuous basis. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))

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))

 The permittee shall monitor and record, in a satisfactory manner, the pressure drop across the baghouse for EUATOMIZER2 on a weekly basis. All records shall be kept on file and made available to the Department upon request. (R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.2802, 40 CFR 52.21(c) and (d))

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. SVARRECLAIM*	6	25	R 336.1225, 40 CFR 52.21 (c) and (d)
2. SVAREXHAUST*	6	25	R 336.1225, 40 CFR 52.21 (c) and (d)
3. SVVACPUMP*	3	10	R 336.1225, 40 CFR 52.21 (c) and (d)

^{*}Exhaust is either horizontal or downward.

IX. OTHER REQUIREMENTS

NA

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

The following conditions apply to: EUEVAPORATOR

DESCRIPTION: Waste water evaporator system.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

I. <u>EMISSION LIMITS</u>

NA

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

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))

NA

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:

Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
8	30	R 336.1225, 40 CFR 52.21 (c) and (d)
	Diameter/Dimensions	Diameter/Dimensions Above Ground (inches) (feet)

IX. OTHER REQUIREMENTS

NA

Footnotes: ¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).