MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

November 4, 2015

PERMIT TO INSTALL 161-15

ISSUED TO
North Shore Manufacturing Corporation

LOCATED AT 4706 M-63 Coloma, Michigan

IN THE COUNTY OF
Berrien

STATE REGISTRATION NUMBER N7448

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: October 12, 2015		
November 4, 2015	SIGNATURE:	
DATE PERMIT VOIDED:	SIGNATURE:	
DATE PERMIT REVOKED:	SIGNATURE:	

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

	Common Acronyms 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	СО	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
	Quality	ng	Nanogram
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		Particulate Matter equal to or less than 2.5
1120111	Air Pollutants	PM2.5	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
VE	Agency	μm	Micrometer or Micron
VE	Visible Emissions	VOC	Volatile Organic Compounds Year
*Fa= UV/I D a==	licators, the pressure measured at the gun air ca	yr	

^{*}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.
- 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.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Flexible Group ID
EUREVERB1	12,000 lb capacity 5 MMBtu/hr natural gas-fired aluminum melt furnace, no control	FGREVERB1-2-3
EUREVERB2	1,800 lb capacity 1.5 MMBtu/hr natural gas-fired aluminum melt furnace, no control	FGREVERB1-2-3
EUREVERB3	1,800 lb capacity 1.5 MMBtu/hr natural gas-fired zinc melt furnace, no control	FGREVERB1-2-3
EUHOLD1	2,100 lb capacity 0.75 MMBtu/hr natural gas fired aluminum holding furnace, no control	FGHOLD1-2-3-4
EUHOLD2	1,600 lb capacity 0.54 MMBtu/hr natural gas fired aluminum holding furnace, no control	FGHOLD1-2-3-4
EUHOLD3	1,600 lb capacity 0.54 MMBtu/hr natural gas fired aluminum holding furnace, no control	FGHOLD1-2-3-4
EUHOLD4	1,600 lb capacity 0.54 MMBtu/hr natural gas fired aluminum holding furnace, no control	FGHOLD1-2-3-4
Changes to the equipm	ent described in this table are subject to the requirements of R	336.1201, except as

allowed by R 336.1278 to R 336.1290.

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
FGREVERB1-2-3	Aluminum and Zinc melting natural gas-fired furnaces	EUREVERB1 EUREVERB2 EUREVERB3
FGHOLD1-2-3-4	Aluminum holding natural gas-fired furnaces	EUHOLD1 EUHOLD2 EUHOLD3 EUHOLD4
FGNESHAP-RRR	Aluminum melting natural gas-fired furnaces	EUREVERB1 EUREVERB2

The following conditions apply to: FGREVERB1-2-3

DESCRIPTION: Aluminum and Zinc melting natural gas-fired furnaces

Emission Units: EUREVERB1, EUREVERB2, EUREVERB3

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	2.12 lb/hr	Test Protocol*	FGREVERB1-2-3	GC 13 SC VI.2	R 336.1205(1)(a), R 336.1205(3), R336.1331
2. PM	4.93 lb/ton of metal melted	Test Protocol*	FGREVERB1-2-3	GC 13 SC VI.2	R 336.1205(1)(a), R 336.1205(3), R336.1331
3. Zinc Oxide	0.22 lb/hr	Test Protocol*	EUREVERB3	GC 13	R336.1224, R336.1225
* Test protocol shall specify averaging time					

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not use more than 5.05 pounds of flux in EUREVERB1 per day. [R336.1225]
- 2. The permittee shall not use any flux in either melting furnace EUREVERB2 or EUREVERB3. [R336.1225]

IV. <u>DESIGN/EQUIPMENT PARAMETERS</u>

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))

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1201, R 336.1205(1)(a))

- 2. The permittee shall keep, in a satisfactory manner, weekly records of the following:
 - a. The number of days in which flux was used
 - b. Flux usage rate in pounds of each flux type
 - c. The identity of each melting furnace in which flux was used
 - d. A calculation of the amount of flux used per day based upon the amount of flux used divided by the number of days flux was used
 - e. Aluminum melt rate and hours of operation for EUREVERB1.

All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R336.1225)

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 Applie Requirement	
1. SV-EUREVERB1	36	36	R336.1224, R336.1225

IX. OTHER REQUIREMENTS

NA

Footnotes:

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

The following conditions apply to: FGHOLD1-2-3-4

DESCRIPTION: Aluminum holding natural gas-fired furnaces

Emission Units: EUHOLD1, EUHOLD2, EUHOLD3, EUHOLD4

POLLUTION CONTROL EQUIPMENT: NA

I. <u>EMISSION LIMITS</u>

NA

II. MATERIAL LIMITS

1. The permittee shall not use any flux in any holding furnace in FGHOLD1-2-3-4. [R336.1225]

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. <u>DESIGN/EQUIPMENT PARAMETERS</u>

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

1. The permittee shall keep, in a satisfactory manner, monthly records indicating if any flux was used in any holding furnace in FGHOLD1-2-3-4. All records shall be kept on file for a period of at least five years and made available to the Department upon request. (R336.1225)

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

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IX. OTHER REQUIREMENTS

NA

 $\label{eq:potnotes:1} \hline \ ^1\text{This condition is state only enforceable and was established pursuant to Rule 201(1)(b).} \\$

The following conditions apply to: FGNESHAP-RRR

DESCRIPTION: Aluminum melting natural gas-fired furnaces

Emission Units: EUREVERB1, EUREVERB2

POLLUTION CONTROL EQUIPMENT: NA

I. EMISSION LIMITS

NA

II. MATERIAL LIMITS

1. The permittee shall melt only clean charge, 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 Hazardous Air Pollutants for Secondary Aluminum Production. (R336.1331, 40 CFR Part 63 Subpart RRR)

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTIONS

NA

IX. OTHER REQUIREMENTS

NA