## MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

February 7, 2018

PERMIT TO INSTALL 4-18

ISSUED TO Selfridge Plating, Inc.

# LOCATED AT

42081 Irwin Drive Harrison Township, Michigan

IN THE COUNTY OF

Macomb

## STATE REGISTRATION NUMBER B6220

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 24, 2018

 DATE PERMIT TO INSTALL APPROVED:
 SIGNATURE:

 February 7, 2018

 DATE PERMIT VOIDED:
 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 <sub>2</sub> 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 <sub>2</sub> 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         | NOx                                   | Oxides of Nitrogen  |  |
| MODO            | Quality                                      | ng                                    | Nanogram  |  |
| MSDS<br>NA      | Material Safety Data Sheet<br>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               |                                       | Particulate Matter equal to or less than 2.5                    |  |
|                 | Hazardous 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 <sub>2</sub>                       | 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   |  |
|                 |  | μm                                    | Micrometer or Micron  |  |
| VE              | Visible Emissions                            | VOC                                   | Volatile Organic Compounds                                      |  |
|                 |  | yr                                    | Year  |  |

\*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.
- 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)
- 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<br>(Process Equipment & Control Devices)                  | Installation Date /<br>Modification Date | Flexible Group ID |
|--|---|--|-------------------|
|  | Mid-phos electroless nickel plating tank<br>#1, controlled by a composite mesh pad. | Date of PTI                              | FGELECTROLESSNI   |
| EUELECTROLESSNI2   | High-phos electroless nickel plating tank #2, controlled by a composite mesh pad.   | Date of PTI                              | FGELECTROLESSNI   |
| 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. |   |  |                   |

## 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<br>Emission Unit IDs      |
|-------------------|---|--------------------------------------|
| FGELECTROLESSNI   | Two electroless nickel plating tanks controlled by a common composite mesh pad. | EUELECTROLESSNI1<br>EUELECTROLESSNI2 |

### The following conditions apply to: FGELECTROLESSNI

**DESCRIPTION:** Two electroless nickel plating tanks.

Emission Units: EUELECTROLESSNI1 and EUELECTROLESSNI2

**POLLUTION CONTROL EQUIPMENT:** Composite mesh pad.

I. EMISSION LIMITS

NA

### II. MATERIAL LIMITS

NA

### III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate any electroless nickel plating tank in FGELECTROLESSNI unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the composite mesh pad, 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 336.1224, R 336.1225, R 336.1910, R 336.1911)** 

#### IV. DESIGN/EQUIPMENT PARAMETERS

- The permittee shall not operate any electroless nickel plating tank in FGELECTROLESSNI unless the composite mesh pad is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes but is not limited to maintaining the composite mesh pad according to the MAP required by SC III1. The MAP shall define the proper pressure drop to be maintained, as specified by the manufacturer. (R 336.1224, R 336.1225, R 336.1910)
- 2. The permittee shall equip and maintain the composite mesh pad with a device to monitor pressure drop on a continuous basis. (R 336.1224, R 336.1225, R 336.1910)

#### 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. The permittee shall perform inspections of the composite mesh pad as follows: (R 336.1224, R 336.1225, R 336.1910)
  - a) Determine pressure drop across the composite mesh pad on a daily basis. If the pressure drop across the control varies by more than the recommended range as specified by the manufacturer, the permittee shall document the variation, and review the operation and maintenance procedures. The permittee shall document any corrective action.
  - b) Visually inspect ductwork from tanks to the composite mesh pad, on a quarterly basis, to ensure there are no leaks.
- The permittee shall keep daily records of the pressure drop readings and records of the inspections of the ductwork on file at the facility and make them available to the Department upon request. (R 336.1224, R 336.1225, R 336.1910)

#### VII. <u>REPORTING</u>

#### 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<br>Diameter/Dimensions<br>(inches) | Minimum Height<br>Above Ground<br>(feet) | Underlying Applicable<br>Requirements |
|-----------------|--|--|---------------------------------------|
| 1. SV-CMP       | 25   | 29.8                                     | R 336.1225<br>40 CFR 52.21(c) and (d) |

#### IX. OTHER REQUIREMENTS

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants for Plating and Polishing Operations as specified in 40 CFR Part 63 Subparts A and WWWWWW, as they apply to FGELECTROLESSNI. (40 CFR Part 63 Subparts A & WWWWWW)

#### Footnotes:

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