

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

September 26, 2018

PERMIT TO INSTALL
447-89B

ISSUED TO
Franklin Metal Trading Company

LOCATED AT
609 Tupper Lake Road
Lake Odessa, Michigan

IN THE COUNTY OF
Ionia

STATE REGISTRATION NUMBER
N2199

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: July 12, 2018	
DATE PERMIT TO INSTALL APPROVED: September 26, 2018	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	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO _{2e}	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		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.

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
EUFURNACE	A gas-fired sweat furnace with melt and holding chambers. The furnace is equipped with two 3.4 mmBtu/hr burners in the melt chamber and one 3.2 mmBtu/hr burner in the holding chamber. The holding capacity is 32,000 pounds. Emissions are controlled by an afterburner, spark arrestor, and 60,000 cfm lime coated baghouse. The furnace is also equipped with a side-well for charging aluminum scrap and emissions are controlled through the lime coated baghouse.	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: EUFURNACE

DESCRIPTION: A gas-fired sweat furnace with melt and holding chambers. The furnace is equipped with two 3.4 mmBtu/hr burners in the melt chamber and one 3.2 mmBtu/hr burner in the holding chamber. The holding capacity is 32,000 pounds. Emissions are controlled by an afterburner, spark arrestor, and 60,000 cfm lime coated baghouse. The furnace is also equipped with a side-well for charging aluminum scrap and emissions are controlled through the lime coated baghouse.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: Afterburner, spark arrestor, and 60,000 cfm lime coated baghouse

I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Hydrogen Fluoride (HF)	5.94 lb/hr ¹	Hourly	EUFURNACE	SC V.1	R 336.1225
2. Hydrogen Chloride (HCl)	5.94 lb/hr ¹	Hourly	EUFURNACE	SC V.1	R 336.1225
3. Copper	0.14 lb/hr ¹	Hourly	EUFURNACE	SC V.1	R 336.1225
4. Nickel	0.0048 lb/hr ¹	Hourly	EUFURNACE	SC V.1	R 336.1225
5. Cobalt	0.014 lb/hr ¹	Hourly	EUFURNACE	SC V.1	R 336.1225
6. D/F (dioxins and furans)	0.80 ng TEQ**/dscm @ 11% O ₂	Test Protocol*	EUFURNACE	SC V.1, SC VI.2	40 CFR Part 63 Subpart RRR
7. Visible Emissions	10 percent opacity	Six-minute Average	EUFURNACE	SC V.1	R 336.1301

* Test Protocol shall specify averaging time
 ** TEQ means the international method of expressing toxicity equivalents for D/F as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016).

II. MATERIAL LIMITS

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Metal input	37.5 ton/day	Daily	EUFURNACE	SC VI.1	R 336.1205, R 336.1224, R 336.1225
2. Flux usage	258 lb/ton of metal charged	Daily	EUFURNACE	SC VI.1	R 336.1224, R 336.1225

3. The permittee shall not add flux with a fluorine content greater than 60.32% to EUFURNACE.¹ (R 336.1224, R 336.1225)

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EUFURNACE unless a minimum temperature of 1,600°F and a minimum retention time of 1.0 second in the afterburner are maintained. (R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR Part 63 Subpart RRR)

2. Within 30 days after the issuance date of this permit, the permittee shall submit to the AQD District Supervisor, for review and approval, an operation and maintenance (O&M) plan for the afterburner and lime coated baghouse. The plan shall include, but is not limited to, the following:
 - a) Monthly inspections of the equipment that is important to the performance of the control device.
 - b) Preventative maintenance plan for each control device, including a schedule.
 - c) A site-specific monitoring plan for detection of failure of the afterburner and lime coated baghouse.
 - d) Corrective action plan for the afterburner and baghouse.
 - e) Procedures including frequency for coating the baghouse bags with lime.

The permittee shall maintain and implement the approved O&M plans at all times. **(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 EUFURNACE unless the afterburner and lime coated baghouse system is installed, maintained, and operated in a satisfactory manner. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910)**
2. The permittee shall equip and maintain the lime coated baghouse with a pressure drop indicator. **(R 336.1205, 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))**

1. Upon request from the Department, the permittee shall verify and quantify emission rates of hydrogen fluoride, hydrogen chloride, copper, nickel, cobalt, dioxins and furans, and visible emissions by testing at the owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the tests. **(R 336.1205, R 336.2001, R 336.2003, R 336.1225)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall record, in a satisfactory manner, flux usage and metal input on a daily basis, for EUFURNACE, as required by SC II.1 and SC II.2. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225)**
2. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the operating temperature and residence time of the afterburner on a continuous basis. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910)**
3. The permittee shall maintain, monitor and record on a daily basis, the lime injection or coating rate for the baghouse in accordance with the specifications recommended by the manufacturer. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1910)**
4. The permittee shall monitor and record, in a satisfactory manner, the pressure drop across each cartridge/fabric filter on a daily basis, at least once during each calendar day that EUFURNACE is being charged. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request. **(R 336.1205(1)(a), R 336.331, R 336.1910)**

5. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each fluxing material processed in EUFURNACE, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file at the facility for a period of at least five years and make them available to the Department upon request.¹ **(R 336.1224, R 336.1225)**

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 Applicable Requirements
1. SVFURNACE	60	35	40 CFR 52.21 (c) and (d), R 336.1225

IX. Other Requirements

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63 Subpart RRR, for Secondary Aluminum Production. **(40 CFR Part 63 Subpart RRR)**

Footnotes:

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