

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

June 27, 2007

**PERMIT TO INSTALL  
No. 196-00C**



**ISSUED TO**  
Kenwal Pickling, LLC

**LOCATED AT**  
8223 West Warren Avenue  
Dearborn, Michigan 48126

**IN THE COUNTY OF**  
Wayne

**STATE REGISTRATION NUMBER**  
M4847

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: <b>6/26/2007</b>	
DATE PERMIT TO INSTALL APPROVED: <b>6/27/2007</b>	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	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	NOx	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality	PM	Particulate Matter
MIOSHA	Michigan Occupational Safety & Health Administration	PM-10	Particulate Matter less than 10 microns diameter
MSDS	Material Safety Data Sheet	pph	Pound per hour
NESHAP	National Emission Standard for Hazardous Air Pollutants	ppm	Parts per million
NSPS	New Source Performance Standards	ppmv	Parts per million by volume
NSR	New Source Review	ppmw	Parts per million by weight
PS	Performance Specification	psia	Pounds per square inch absolute
PSD	Prevention of Significant Deterioration	psig	Pounds per square inch gauge
PTE	Permanent Total Enclosure	scf	Standard cubic feet
PTI	Permit to Install	sec	Seconds
RACT	Reasonably Available Control Technology	SO <sub>2</sub>	Sulfur Dioxide
ROP	Renewable Operating Permit	THC	Total Hydrocarbons
SC	Special Condition	tpy	Tons per year
SCR	Selective Catalytic Reduction	µg	Microgram
SRN	State Registration Number	VOC	Volatile Organic Compounds
TAC	Toxic Air Contaminant	yr	Year
TEQ	Toxicity Equivalence Quotient		
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, 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 AQD District Supervisor shall be notified, in writing, of a change in ownership or operational control of the stationary source or emission unit(s) authorized by this Permit to Install pursuant to R 336.1219. The notification shall include all of the information required by R 336.1219(1)(a) and (b). In addition, a new owner or operator must submit a written statement pursuant to R 336.1219(1)(c), agreeing to and accepting the terms and conditions of this Permit to Install, and shall notify the AQD District Supervisor of any change in the contact person for this Permit to Install. **(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 nor does it affect any liability for past violations under the Natural Resources and Environmental Protection Act, 1994 PA 451.
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 Identification**

<b>Emission Unit ID</b>	<b>Emission Unit Description</b>	<b>Stack Identification</b>
EUPICKLINGLINE	The push/pull pickling line consists of four HCl pickling tanks, controlled by a plate type water scrubber, and six rinse tanks.	SV001
EUSTGTANKS	Two (2) 25,000 gallon HCl (fresh acid) storage tanks, three (3) 25,000 gallons ferrous chloride storage tanks, and one (1) 12,000 gallon spent rinse water storage tank – controlled by a plate type water scrubber.	SV001
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 Identification**

<b>Flexible Group ID</b>	<b>Emission Units Included in Flexible Group</b>	<b>Stack Identification</b>
FGFACILITY	EUPICKLINGLINE, EUSTGTANKS, and all process equipment at the facility including equipment covered by other permits, grand-fathered equipment and exempt equipment.	N/A

**The following conditions apply to: EUPICKLINGLINE**

**Emission Limits**

	<b>Pollutant</b>	<b>Limit</b>	<b>Time Period</b>	<b>Equipment</b>	<b>Testing/ Monitoring Method</b>	<b>Applicable Requirement</b>
1.1a	Hydrochloric Acid	0.8 pph	Test Method	EUPICKLINGLINE	GC 13, SC 1.8, SC 1.9, SC 1.10, SC 1.11	R 336.1224, R 336.1225

**Process/Operational Limits**

- 1.2 The permittee shall use fresh water for any make-up water, and shall supply this water to the unit at the top of the plate scrubber. **(R 336.1224, R 336.1225, R 336.1910)**
- 1.3 The permittee shall maintain a minimum scrubber liquid flow rate of two gallons per minute, or the flow rate documented during the most recent acceptable compliance test, in the scrubber. **(R 336.1224, R 336.1225, R 336.1910)**
- 1.4 The permittee shall determine pressure drop across the packed bed scrubber on a once per week basis when EUPICKLINGLINE is operating. If the pressure drop across the control varies by more than ± 3 inch of water gauge, from the pressure drop determined during compliance testing, the variation shall be documented, and the operation and maintenance procedures shall

be reviewed. Any corrective action shall be documented. **(R 336.1224, R 336.1225, R 336.1910)**

- 1.5 The permittee shall operate in accordance with the approved operation and maintenance plan, and the approved startup, shut down and malfunction abatement plan. Any changes to these plans shall be submitted in writing to the AQD District Supervisor and approved by the AQD District Supervisor prior to implementing the changes. The permittee shall not operate the facility unless all of these plans and procedures are implemented and maintained. **(R 336.1224, R 336.1225, R 336.1910)**

### Equipment

- 1.6 Except during loading and unloading of acid, the (fresh acid) HCl storage tanks shall be equipped with a closed-vent system. Loading and unloading of acid shall be conducted either through enclosed lines or each point, where acid is exposed to the atmosphere, shall be equipped with a local fume capture system, vented to the scrubber. **(R 336.1224, R 336.1225, R 336.1910)**
- 1.7 The permittee shall not operate EUPICKLINGLINE unless the plate scrubber is installed, maintained, and operated in a satisfactory manner. **(R 336.1224, R 336.1225, R 336.1910)**

### Monitoring

- 1.8 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the pressure drop across the plate scrubber on a continuous basis. **(R 336.1224, R 336.1225, R 336.1910)**
- 1.9 The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor the liquid flow rate of the plate scrubber on a continuous basis. The monitoring device used to monitor the water flow rate shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions. **(R 336.1224, R 336.1225, R 336.1910)**

### Recordkeeping/Reporting/Notification

- 1.10 The permittee shall keep records of the plate scrubber liquid flow rate on a once per shift basis when EUPICKLING is operating. 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 336.1224, R 336.1225, R 336.1910)**
- 1.11 The permittee shall keep records of the pressure drop across the plate scrubber on a once per week basis when EUPICKLINGLINE is operating. 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 336.1224, R 336.1225, R 336.1910)**

### Stack/Vent Restrictions

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
1.12a	SV001	30	60	R 336.1225
The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.				

**The following conditions apply to: FGFACILITY**

**Emission Limits**

	<b>Pollutant</b>	<b>Limit</b>	<b>Time Period</b>	<b>Equipment</b>	<b>Testing/ Monitoring Method</b>	<b>Applicable Requirement</b>
2.1a	Each Individual HAP	Less than 9 tpy	12-month rolling time period*	FGFACILITY	SC 2.2	R 336.1205(3)
2.1b	Aggregate HAPs	Less than 22.5 tpy	12-month rolling time period*	FGFACILITY	SC 2.2	R 336.1205(3)

\* As determined at the end of each calendar month.

**Recordkeeping / Reporting / Notification**

2.2 The permittee shall keep, in a satisfactory manner, individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month, as required by SC 2.1a and 2.1b. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months. 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(3))**