

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION**

July 16, 2021

**PERMIT TO INSTALL
15-01B**

**ISSUED TO
Fritz Products, Inc.**

**LOCATED AT
255 Marion Street
River Rouge, Michigan 48218**

**IN THE COUNTY OF
Wayne**

**STATE REGISTRATION NUMBER
M4547**

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. 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: May 18, 2021	
DATE PERMIT TO INSTALL APPROVED: July 16, 2021	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO ₂ e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO ₂	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

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 Environment, Great Lakes, and Energy, 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 Rule 210 (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 Rule 219 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 Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(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 condition 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 Rule 301, 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 Rule 303 (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 Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

EMISSION UNIT 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 (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUALUMINUM	A Rotary Drum Cylinder preheater and a Reverberatory Furnace with 2 burners each rated for 5 MMBtu/hr with a aluminum production rate of 7 tons/hr. The emissions are controlled with a baghouse dust collector with lime and activated carbon injection.	2001/2005	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 336.1291.

**EUALUMINUM
 EMISSION UNIT CONDITIONS**

DESCRIPTION

A Rotary Drum Cylinder preheater and a Reverberatory Furnace with 2 burners each rated for 5 MMBtu/hr with a maximum aluminum production rate of 7 tons/hr.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Baghouse with lime and activated carbon injection

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.0095 lb/1,000 lbs exhaust gas	Hourly	EUALUMINUM	SC V.1	R 336.1205, R 336.1331
2. PM2.5	3.2 pph	Hourly	EUALUMINUM	SC V.1	40 CFR 52.21 (c) & (d)
3. HCl	2.03 pph	Hourly	EUALUMINUM	SC V.1	R 336.1224, R 336.1225, R 336.1205(1)(a) & (3), R 336.1225, R 336.1910, 40 CFR 52.21 (c) & (d), 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02
4. HCl	8.89 tpy ¹	12-month rolling time period as determined at the end of each calendar month	EUALUMINUM	SC VI.4	R 336.1225
5. Dioxins/Furans (D/F)	3.0 x 10 ⁻⁸ lb per ton aluminum*	3 day, 24-hour rolling average	EUALUMINUM	SC V.1	63.1505(i)(3)_

* Equivalent to 2.1 x 10⁻⁴ gr D/F TEQ per ton of feed/charge specified in 63.1505(i)(3)_

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Aluminum Production	60,000 tpy	12-month rolling time period as determined at the end of each calendar month	EUALUMINUM	SC VI.2	R 336.1205, R 336.1224, R 336.1225, 40 CFR 52.21 (c) & (d)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
2. Aluminum Production	168 tons per day	Calendar Day	EUALUMINUM	SC VI.2	R 336.1205, R 336.1224, R 336.1225, 40 CFR 52.21 (c) & (d))
3. Natural Gas Usage Rate	96.36 MMSCF/yr	12-month rolling time period as determined at the end of each calendar month	EUALUMINUM	SC VI.3	R 336.1205(1), R 336.1225, R 336.1301, R 336.1702, 40 CFR 52.21 (c) & (d))
4. Flux Fluoride Content Limit	Fluoride compound content of solid flux shall be no more than 5% by weight ¹	Instantaneous	EUALUMINUM	SC VI.5	R 336.1224, R 336.1225
5. Liquid Chlorine Flux	The average lb/hour usage over all runs of the most recent compliant performance test OR 198 lb/hr of usage prior to a compliant performance test	Hourly based on the lesser of 6-hour blocks or the total number of hours for all test runs for the most recent compliant D/F and HCl test	EUALUMINUM	SC VI.9	R 336.1224, R 336.1225, 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02)

6. The permittee shall burn only natural gas in EUALUMINUM. (R 336.1201(3), R 336.1205, R 336.1224, R 336.1225, R 336.1702)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Applicant shall not operate the EUALUMINUM unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix A has been implemented and is maintained. (R 336.1732)
2. The permittee shall not operate EUALUMINUM unless an Operations, Maintenance, and Monitoring Plan (OMM Plan) for the lime injection system and baghouse, has been submitted within 60 days of permit issuance, and is implemented and maintained. The plan shall contain compliant operating values for the temperature of the fabric filter inlet gasses, chlorine flux addition rate, lime addition rate, activated carbon injection rate, and operation of a bag leak detection system. If at any time the OMM Plan fails to address or inadequately addresses operating, maintenance, or monitoring including addressing an event that meets the characteristics of a malfunction, the permittee shall amend the OMM Plan within 45 days after such an event occurs. The permittee shall also amend the OMM Plan within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the OMM Plan and any amendments to the plan to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the OMM Plan or amended OMM Plan 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 336.1702(a), R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d), 40 CFR Part 63, Subpart RRR, 40 CFR 63.1510(b), ACO EPA-5-20-113(a)-MI-02)
3. The permittee shall maintain the lime feeder setting at or above the level established during the most recent compliant performance test as described in 40 CFR 63.1510(l) or in the ACO.. (R 336.1224, R 336.1225, ACO EPA-5-20-113(a)-MI-02)

4. The permittee shall maintain the average hourly lime addition rate for each averaging time period at a minimum of 21 pounds per hour or at a minimum of 90% of the average hourly addition rate determined over that time period being the lesser of six hours, or the total number of hours for all test runs used to test D/F and HCl emissions in the most recent compliant performance test. **(R 336.1224, R 336.1225, ACO EPA-5-20-113(a)-MI-02)**
5. The permittee shall maintain the hourly activated carbon addition rate for each averaging time at a minimum average hourly addition rate determined for that time period being the lesser of six hours, or the total number of hours for all test runs used to test D/F and HCl emissions under the most recent compliant performance test. The averaging time shall be no longer than a six hour period or the total number of hours for all test runs used to test D/F and HCl emissions in the most recent compliant performance test. Prior to a compliant D/F and HCl emissions test, a minimum of 2.69 pounds per hour shall be used. **(R 336.1224, R 336.1225, ACO EPA-5-20-113(a)-MI-02)**
6. The permittee shall maintain a bag leak detection system which has an alarm when the pressure across the baghouse falls outside of the range indicated in the Operations, Maintenance, and Monitoring Plan (OMM Plan). **(40 CFR 63.1510(m))**
7. The permittee shall provide and maintain easily visible labels posted at EUALUMINUM that identify the applicable emission limits and means of compliance., **(40 CFR Part 63, Subpart RRR, 40 CFR 63.1506 (b))**
8. The permittee shall install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases consistent with the requirements for continuous monitoring systems in 40 CFR Part 63 Subpart A. The permittee shall maintain the temperature of the gas at the inlet of the baghouse dust collector to not exceed 164 °F or the temperature established during the most recent D/F and HCl performance test conducted, based on a three-hour average, pursuant to 40 CFR 63.1510(m). The temperature monitoring device shall meet each of these performance and equipment specifications: **(R 336.1224, R 336.1225, 40 CFR 63.1506(m)(3), 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02)**
9. Doors over charge bin of EUALUMINUM must be closed when active loading is not taking place. **(R 333.1331)**
10. Doors over fluxing well of EUALUMINUM must be closed when fluxing is not being performed. **(R 333.1331)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate the EUALUMINUM unless the baghouse associated with the emission unit is installed, operating, and maintained in accordance with manufacturers operation and maintenance manual and in accordance with the approved OMM Plan. A pressure gauge must be installed which measures pressure drop across the baghouse and sounds an alarm when the pressure drop is outside of the range specified in the OMM Plan. **(R 336.1910)**
2. The permittee shall not operate EUALUMINUM unless the automatic lime injection system, activated carbon injection system, and associated baghouse with leak detection system are installed, operating, and maintained in accordance with manufacturer's instructions and in accordance with the approved OMM Plan. Proper operation includes operation of the lime injection system such that the lime feed rate is no less than the amount identified during the most recent compliant D/F and HCl performance test, as required to show compliance with the D/F and HCl limit. **(R 336.1205, R 336.1224, R 336.1225)**
3. The permittee shall install, calibrate, maintain, and operate, in a satisfactory manner, a device to monitor and record the natural gas usage from EUALUMINUM on a continuous basis. **(R 336.1205(1), R 336.1225, 40 CFR 52.21 (c) & (d))**

4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the temperature of the fabric filter inlet gases for EUALUMINUM on a continuous basis. The equipment shall record the temperature in 15-minute block averages and calculate and record the average temperature for each 3-hour block period. **(40 CFR 63.1510(h)(2), 40 CFR Part 63 Subparts A & RRR, ACO PA-5-20-113(a)-MI-02)**
5. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the weight of total liquid reactive chlorine flux added to EUALUMINUM for each 15-minute block period during which reactive fluxing occurs. **(R 336.1224, R 336.1225, 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02)**
6. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record continuously measures and records the lime addition rate into EUALUMINUM exhaust stream for each 15-minute block period. **(R 336.1224, R 336.1225, 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02)**
7. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the weight of aluminum processed for each six-hour period, or that time period being the lesser of six hours, or the total number of hours for all the test runs used to test D/F and HCl emissions in the most recent compliant performance test **(R 336.1224, R 336.1225, 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02)**
8. The permittee shall calibrate, operate, and maintain the device that continuously measures and records the activated carbon addition rate into EUALUMINUM exhaust stream for each 15-minute block period. **(R 336.1224, R 336.1225, 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02)**

V. TESTING/SAMPLING

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

- 1 The permittee shall verify PM, PM2.5, HCl and D/F emission rates of the lime injection system and baghouse from EUALUMINUM by testing at owner's expense, in accordance with Department requirements. Testing shall take place by December 31, 2022, and within every 5 years thereafter unless otherwise approved by the District Supervisor. The permittee may request further testing be waived based on previous testing results on a pollutant-by-pollutant basis. Testing shall be performed using an approved EPA Method listed the table below.

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10 / PM2.5	40 CFR Part 51, Appendix M
Hydrogen Chloride	40 CFR Part 60, Appendix A
Dioxins / Furans	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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, including any modifications to the method in the test protocol that are proposed after initial submittal. 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 test. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21 (c) & (d), 40 CFR Part 63 Subparts A & RRR)**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations 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 336.1205(1), R 336.1224, R 336.1225, R 336.1910, 40 CFR 52.21 (c) & (d))**
2. The permittee shall monitor and record, in a satisfactory manner, the aluminum production for EUALUMINUM on a daily, monthly, and 12-month rolling time period basis. **(R 336.1205(1), R 336.1224, R 336.1225, 40 CFR 52.21 (c) & (d))**
3. The permittee shall monitor and record, in a satisfactory manner, the natural gas usage rate from EUALUMINUM on a monthly and 12-month rolling time period basis. **(R 336.1205(1), R 336.1225, R 336.1301, R 336.1702, 40 CFR 52.21 (c) & (d))**
4. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period HCl emission calculation records for EUALUMINUM. The permittee shall use the HCl emission rate determined during the most recent performance test, and the effects of deviations from the parameters, process upsets, malfunctions or other HCl emissions events using standard and recognized engineering practices, if available, to calculate monthly and 12-month rolling HCl emissions. All records shall be kept on file and made available to the Department upon request. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1910, 40 CFR 52.21 (c) & (d) 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02)**
5. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each flux material used, 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 and make them available to the Department upon request. **(R 336.1205(1), R 336.1224, R 336.1225)**
6. The permittee shall monitor and record the lime powder feed rate of the lime injection system on a continuous basis in a manner and with instrumentation acceptable to Air Quality Division. The monitors and associated monitoring data shall be used for compliance demonstration purposes for the control efficiency of the lime injection system. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1), R 336.1224, R 336.1225, R 336.1910)**
7. The permittee shall monitor and record the pressure drop across the baghouse on a continuous basis in a manner and with instrumentation acceptable to Air Quality Division. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1), R 336.1224, R 336.1225 R 336.1910, 40 CFR 52.21 (c) & (d))**
8. The permittee shall keep records of the maintenance and calibration of the lime injection system and the baghouse and all associated monitors in accordance with the OMM Plan in a manner acceptable to the Air Quality Division. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205(1), R 336.1224, R 336.1225 R 336.1910, 40 CFR 52.21 (c) & (d))**
9. The permittee shall calculate and record the average hourly total liquid reactive chlorine flux addition rate for that time period being the lesser of six hours or the total number of hours for all test runs used to test D/F and HCl emissions in the most recent compliant performance test. **(R 336.1225, 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02)**
10. The permittee shall calculate and record the hourly lime addition for that time period being the lesser of six hours, or the total number of hours for all test runs used to test D/F and HCl emissions in the most recent compliant performance test. **(R 336.1225, 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02)**
11. The permittee shall calculate and record the average hourly activated carbon addition rate for each six-hour period, for that time period being the lesser of six hours, or the total number of hours for all test runs used to test D/F and HCl emissions in the most recent compliant performance test **(R 336.1225, 40 CFR Part 63 Subparts A & RRR, ACO EPA-5-20-113(a)-MI-02)**

12. The permittee shall record the lime feeder setting once each day of operation. **(R 336.1224, R 336.1225, R 336.1910, ACO EPA-5-20-113(a)-MI-02)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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. SVALUMINUM	60	75	R 336.1225, 40 CFR 52.21 (c) & (d)
2. SVReverFurnace1	20 x 24	45.25	R 336.1225, 40 CFR 52.21 (c) & (d)
The SVReverbFurnace1 stack shall be used when the preheater is not in operation. When the preheater and the reverberatory furnace are both in operation all the exhaust gases shall exhaust from the SVALUMINUM stack.			

IX. OTHER REQUIREMENT(S)

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 Subparts A and RRR, as they apply to EUALUMINUM. **(40 CFR Part 63 Subparts A & RRR)**

Footnotes:

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

FGFACILITY CONDITIONS

DESCRIPTION

The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

POLLUTION CONTROL EQUIPMENT

Baghouse with lime and activated carbon injection

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Individual HAP	Less than 10.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.1 and VI.2	R 336.1205(1)
2. Aggregate HAP	Less than 24.0 tpy	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.1 and VI.2	R 336.1205(1)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

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. Within 30 days after the issuance date of this permit, the permittee shall develop a spreadsheet for approval by the AQD District Supervisor to calculate all emissions for FG-FACILITY as specified in SC I.1 and I.2, based on material usage rates, test results, and/or emission factors. The permittee shall complete all required calculations and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205(1))**
2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period individual and aggregate HAP emission calculation records for FGFACILITY, as required by SC I.1 and SC I.2. The permittee shall keep all records on file at for a period of at least five years and make them available to the Department upon request. **(R 336.1205(1))**

3. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor and make them available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1205(1))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

APPENDIX A
FUGITIVE DUST CONTROL PROGRAM

- A. Paved Road
 - 1. Water flushing twice per week
 - 2. Speed Control – less than 10 mph (Post Signage)

- B. Paved Lot
 - 1. Water flushing monthly
 - 2. Speed Control – less than 10 mph (Post Signage)

- C. Unpaved Road
 - 1. Speed Control – less than 10 mph (Post Signage)
 - 2. Road resurface and weekly cleaning.

- D. Unpaved Lot
 - 1. Speed Control – less than 10 mph (Post Signage)
 - 2. Lot resurface and weekly cleaning

- E. Storage Pile Area and Activities
 - 1. Load in Operation – limit drop height to less than 2 feet where possible
 - 2. Maximum pile height at 75% of surrounding building height
 - 3. Maintain minimum moisture of 10% at surface

- F. Open Area
 - 1. Paved Portion – water flushing four time per year
 - 2. Speed Control - less than 10 mph (Post Signage)

- G. Miscellaneous
 - 1. Spilled Material – clean daily
 - 2. Track out – clean daily
 - 3. Install wind breaks
 - 4. Transfer points to be enclosed or water suppressed