

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

January 10, 2019

**PERMIT TO INSTALL  
72-06C**

**ISSUED TO**  
Superior Brass & Aluminum Casting Co.

**LOCATED AT**  
4893 Dawn Avenue  
East Lansing, Michigan

**IN THE COUNTY OF**  
Ingham

**STATE REGISTRATION NUMBER**  
A1588

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: <b>November 19, 2019</b>	
DATE PERMIT TO INSTALL APPROVED: <b>January 10, 2020</b>	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 <sub>2</sub> 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 <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	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 <sub>2</sub>	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 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 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.

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Flexible Group ID</b>
EUMELT/POUR	Brass foundry operations with four electric pot furnaces (400 lb capacity each) and a pouring station controlled by a cartridge dust collector.	NA
EUSHAKEOUT	A drum-type shakeout and casting separation system controlled by a cartridge dust collector.	NA
EUCORESHAKE	Three core making machines and final shakeout process controlled by a cartridge dust collector.	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.

**EUMELT/POUR  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Brass foundry operations with four electric pot furnaces (400 lb capacity each) and a pouring station controlled by a cartridge dust collector.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Cartridge-style dust collector.

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. PM	0.01 lb/1,000lbs of exhaust gases on a dry basis	Hourly	EUMELT/POUR	GC 13	R 336.1331
2. PM	0.21 pph	Hourly	EUMELT/POUR	GC 13	R 336.1331
3. PM10	0.01 pph	Hourly	EUMELT/POUR	GC 13	40 CFR 52.21 (c) and (d)
4. PM2.5	0.01 pph	Hourly	EUMELT/POUR	GC 13	40 CFR 52.21 (c) and (d)

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall equip and maintain EUMELT/POUR with a dust collector system with bag leak detector and alarm system. **(R 336.1205, R 336.1220, R 336.1224, R 336.1225, R 336.1910)**
2. The permittee shall not operate EUMELT/POUR unless the associated dust collector system is installed, maintained, and operated in a satisfactory manner. **(R 336.1205, R 336.1220, R 336.1224, R 336.1225, R 336.1301, R 336.1331, 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))**

NA

**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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV001	50	35	40 CFR 52.21 (c) and (d) R 336.1225

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

<b>EUSHAKEOUT EMISSION UNIT CONDITIONS</b>
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**DESCRIPTION**

A drum-type shakeout and casting separation system controlled by a cartridge dust collector.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Cartridge-style dust collector.

**I. EMISSION LIMIT(S)**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Monitoring / Testing Method</b>	<b>Underlying Applicable Requirements</b>
1. PM	0.01 lb/1,000lbs of exhaust gases on a dry basis	Hourly	EUSHAKEOUT	GC 13	R 336.1331
2. PM	0.06 pph	Hourly	EUSHAKEOUT	GC 13	R 336.1331
3. PM	0.28 tpy	Annual	EUSHAKEOUT	GC 13	R 336.1331

4. Visible emissions from EUSHAKEOUT shall not exceed a six-minute average of 5 percent opacity.  
(R 336.1301, R 336.1331)

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall equip and maintain EUSHAKEOUT with a dust collector system with bag leak detector and alarm system. (R 336.1205, R 336.1220, R 336.1224, R 336.1225, R 336.1910)
2. The permittee shall not operate EUSHAKEOUT unless the associated dust collector system is installed, maintained, and operated in a satisfactory manner. (R 336.1205, R 336.1220, R 336.1224, R 336.1225, R 336.1301, R 336.1331, 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))

NA

**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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV002	28	24	40 CFR 52.21 (c) and (d), R 336.1225

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

**EUCORESHAKE  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Three core making machines and final shakeout process controlled by a cartridge dust collector.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Cartridge-style dust collector.

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.01 lb/1,000lbs of exhaust gases on a dry basis	Hourly	EUCORESHAKE	GC 13	R 336.1331
2. PM10	0.08 pph	Hourly	EUCORESHAKE	GC 13	40 CFR 52.21(c) and (d)
3. PM2.5	0.08 pph	Hourly	EUCORESHAKE	GC 13	40 CFR 52.21(c) and (d)

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Core Release	219 lb/yr	12-month rolling time period as determined at the end of each calendar month	EUCORESHAKE	SC VI.1	R 336.1225, 40 CFR 52.21(c) and (d)
2. Core Sand	301 tpy	12-month rolling time period as determined at the end of each calendar month	EUCORESHAKE	SC VI.2	R 336.1225, 40 CFR 52.21(c) and (d)

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

NA

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

- The permittee shall equip and maintain EUCORESHAKE with a dust collector system with a leak detector and alarm system. **(R 336.1224, R 336.1225, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))**
- The permittee shall not operate EUCORESHAKE unless the associated dust collector system is installed, maintained, and operated in a satisfactory manner. **(R 336.1224, R 336.1225, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d))**

**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 monitor and record, in a satisfactory manner, the amount of core release used in EUCORESHAKE on a monthly and 12-month rolling time period basis. **(R 336.1225, 40 CFR 52.21(c) and (d))**
2. The permittee shall monitor and record, in a satisfactory manner, the amount of core sand used in EUCORESHAKE on a monthly and 12-month rolling time period basis. **(R 336.1225, 40 CFR 52.21(c) and (d))**

**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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVCORESHAKE	28	35	40 CFR 52.21(c) and (d)

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

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

### FLEXIBLE GROUP SPECIAL CONDITIONS

### FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGMACT6Z	The affected source is the collection of all melting operations located at an aluminum, copper, or other nonferrous foundry, that is an area source of hazardous air pollutant (HAP) emissions. The affected source is an existing small foundry as defined by 40 CFR Part 63 Subpart ZZZZZZ.	NA

<b>FGMACT6Z</b> <b>FLEXIBLE GROUP CONDITIONS</b>
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**DESCRIPTION**

The affected source is the collection of all melting operations located at an aluminum, copper, or other nonferrous foundry, that is (or is part of) an area source of hazardous air pollutant (HAP) emissions. The affected source is an existing small foundry as defined by 40 CFR Part 63 Subpart ZZZZZZ.

**Emission Unit:** NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

1. The permittee shall purchase only metal scrap that has been depleted (to the extent practicable) of aluminum foundry HAP, copper foundry HAP, or other nonferrous foundry HAP in the materials charged to the melting furnace, except metal scrap that is purchased specifically for its HAP metal content for use in alloying or to meet specifications for the casting.
  - a) *Aluminum foundry HAP* means any compound of the following metals: beryllium, cadmium, lead, manganese, or nickel, or any of these metals in the elemental form.
  - b) *Copper foundry HAP* means any compound of any of the following metals: lead, manganese, or nickel, or any of these metals in the elemental form.
  - c) *Other nonferrous foundry HAP* means any compound of the following metals: chromium, lead, and nickel, or any of these metals in the elemental form.

This requirement does not apply to material that is not scrap (e.g., ingots, alloys, sows) or to materials that are not purchased (e.g., internal scrap, customer returns). **(40 CFR 63.11550(a)(2), 40 CFR 63.11556)**

2. The permittee shall melt no more than 6,000 tons of metal(s) per calendar year. This condition is necessary to avoid requirements of 40 CFR Part 63.11550(b). **(40 CFR Part 63, Subpart ZZZZZZ)**

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall cover or enclose each melting furnace that is equipped with a cover or enclosure during the melting operation to the extent practicable, except when access is needed; including, but not limited to charging, alloy addition, and tapping. **(40 CFR 63.11550(a)(1))**
2. The permittee shall prepare and operate pursuant to a written management practices plan. The management practices plan must include the required management practices in SC II.1 and SC III.1 and may include any other management practices that are implemented at the facility to minimize emissions from melting furnaces. **(40 CFR 63.11550(a)(3))**

**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. The permittee shall perform monthly inspections and record results to ensure compliance with SC II.1 and SC III.1. **(40 CFR 63.11553(c)(2))**
2. The permittee shall keep the following records to document conformance with the management practices plan required by SC III.2:
  - a) For melting furnaces equipped with a cover or enclosure, records must identify each melting furnace equipped with a cover or enclosure and document that the procedures in the management practices plan were followed during monthly inspections. These records may be in the form of a checklist.
  - b) Records documenting that the permittee purchased only metal scrap that has been depleted of HAP metals (to the extent practicable) charged to the melting furnace. If you purchase scrap metal specifically for the HAP metal content for use in alloying or to meet specifications for the casting, you must keep records to document that the HAP metal is included in the material specifications for the cast metal product.  
**(40 CFR 63.11552(a), 40 CFR 63.11553(c)(2))**
3. The permittee shall keep a copy of each notification that was submitted to comply with 40 CFR 63 Subpart ZZZZZZ, and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted. **(40 CFR 63.11553(c)(1))**
4. The permittee shall maintain records to document that the facility melts less than 6,000 tpy total of copper, other nonferrous metal, and all associated alloys (excluding aluminum) in each calendar year. Records shall be kept on file for a period of at least five years and made available to the Department upon request. **(40 CFR 63.11553(c)(4))**

#### **VII. REPORTING**

1. The permittee shall submit and keep a copy of an Initial Notification and a Notification Of Compliance Status to the Administrator as specified in 40 CFR Part 63 Subpart ZZZZZZ. **((40 CFR 63.11553(a), (b))**
2. If a deviation occurs during a semiannual reporting period, you must submit a compliance report to your permitting authority according to the requirements below.
  - a) Each reporting period covers the semiannual period from January 1 through June 30 or from July 1 through December 31. Your compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date comes first after the end of the semiannual reporting period.
  - b) A compliance report must include all of the information below.
    - i. Company name and address.
    - ii. Statement by a responsible official, with the official's name, title, and signature, certifying the truth, accuracy and completeness of the content of the report.
    - iii. Date of the report and beginning and ending dates of the reporting period.
    - iv. Identification of the affected source, the pollutant being monitored, applicable requirement, description of deviation, and corrective action taken.  
**(40 CFR 63.11553(e))**

#### **VIII. STACK/VENT RESTRICTION(S)**

NA

**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, Subpart A and Subpart ZZZZZZ for Aluminum, Copper, and Other Nonferrous Foundries by the initial compliance date. **(40 CFR Part 63 Subparts A and ZZZZZZ)**

**Footnotes:**

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